

## SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

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**Reports to:** Planning Committee

24 October 2019

**Author/s:** Joint Director for Planning and Economic Development for  
Cambridge and South Cambridgeshire

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<b>Application Number:</b>	S/4329/18/OL	<b>Agenda Item:</b> 1
<b>Date Received:</b>	7 Dec 2018	
<b>Parishes/Wards:</b>	Hinxton	
<b>Proposal:</b>	Outline planning permission with all matters reserved for a phased, mixed use development comprised of up to 150,000 square metres of Gross External Area (GEA) of flexible employment uses including research and development, office and workspace and associated uses falling within Use Classes B1 (office, laboratories, light industry), B2 (general industrial) and B8 (Storage) uses; up to 1,500 residential dwellings (Use Class C3); supporting community uses and social infrastructure including a nursery (Use Classes D1); conference facility (Use Class D1) and associated hotel (Use Class C1); retail uses including shops (Use Class A1), restaurants and cafes (Use Class A3) and bars (Use Class A4); leisure uses (Use Class D2); landscape and public realm, including areas for sustainable urban drainage and biodiversity enhancements; energy centre and utilities; site access (vehicular, cyclist and pedestrian), car and cycle parking and highways improvements; early landscape and enabling works; and associated works. (This application is subject to an Environmental Impact Assessment)	
<b>Site Address:</b>	Wellcome Genome Campus Hinxton Saffron Walden, Cambridgeshire, CB10 1RQ	
<b>Applicant(s):</b>	Wellcome Trust	
<b>Recommendation:</b>	Approve subject to provisions as set out in the formal recommendation (page 137)	
<b>Application Type:</b>	Outline (all matters reserved)	
<b>Key Material Considerations:</b>	Principle of Development Case for Growth Housing Landscape Heritage Best and most versatile (BMV) Agricultural Land Transport and Highways Impacts Sustainability Drainage	

**Committee Site Visit:** 8 Oct 2019

**Departure Application:** Yes

**Presenting Officer:** Toby Williams, Principal Planning Officer

**Application brought to Committee because:** The application raises significant issues of public interest and is a departure from the South Cambridgeshire Local Plan 2018.

**Decision Due Date:** 24 Oct 2019

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## **1.0 Executive Summary**

- 1.1 Wellcome is seeking outline planning permission to expand its existing Hinxton Genome Campus (the Campus), currently set within and adjacent to the estate of Hinxton Hall on 125-acres of landscaped parkland bordering the river Cam. The Campus is the world's leading centre for genomics research, having played a central role in the Human Genome Project (1990-2003), which read and recorded the complete sequence of DNA in an individual for the first time.
- 1.2 The existing Campus currently employs approximately 2,600 staff utilising 75,000 sq.m of existing scientific research, translation, education and support facilities, which has developed over the last 25 years. The sought permission is for a phased, mixed-use development which would provide up to a further 150,000 sq.m of new research and translation floorspace – resulting in 6,800 people working on the expanded Campus - and up to 1,500 new homes specifically for Campus workers to support the employment provision. The proposal includes land for supporting community and employment infrastructure.
- 1.3 A large triangular parcel of land – referred to as the Expansion Land – sits opposite the existing Campus across the A1301 and it is here where the majority of the new employment floorspace, housing and supporting uses would be accommodated. However, the Expansion Land is outside the Development Framework, outside the Established Employment Area defined for the Campus and is unallocated land in agricultural use.
- 1.4 The application has attracted significant objection from residents, parish councils and third parties. In particular, the transport implications of potentially allowing a scheme of the scale sought onto an already congested transport network at peak hours has caused a considerable degree of objection. Additionally, a scheme of this size would ordinarily be considered and come forward as part of a Local Plan (LP) review. In this regard, significant objections are raised and focus upon the implications of granting permission for Wellcome in the context of the adjacent emerging proposed allocation at North Uttlesford Garden Community immediately across the A11 in the District of Uttlesford.
- 1.5 Furthermore, many objectors point to the potential inconsistency of the Council if it were to support Wellcome's scheme because of similar planning and environmental issues between it and an adjacent site recently proposed and refused by the Council for an AgriTech business park. The AgriTech site is directly adjacent to the north of the Expansion Land and the Council refused and recently defended its position at a planning inquiry in June of this year. The AgriTech site is similarly outside of the Development Framework and on unallocated land in agricultural use. However, the material circumstances and context of the AgriTech scheme are vastly different to Wellcome's. These differences are explained as part of the officer assessment and are material to the recommendation. The outcome of the appeal is awaited but is not expected from the Secretary of State until the New Year.
- 1.6 Officers have assessed the impacts of the planning application and it is without surprise that the development of the Expansion Land conflicts in principle with the adopted Local Plan's spatial economic policies and would result in significant harm to landscape, harm to the setting of heritage assets and result in the permanent loss of 31.3 ha of best and most versatile agricultural land contrary to policies contained within the Council's adopted Local Plan (2018).

- 1.7 Officers consider that Wellcome's application must be considered as put forward on terms which seek planning permission as an exception to the development plan in recognition of this conflict. In officers view, the need for the exception is primarily focused on a Case for Growth and the national economic, health and educational benefits that would arise as a result. These benefits are put forward by the applicant and arise from their vision:
- 1.8 *'to build on the scientific foundations of the campus to become the international centre for scientific, business, cultural and educational activities emanating from Genomes and Biodata'.*
- 1.9 Planning permission is sought on an urgent basis to enable the UK to continue to compete in the global genomics market and within the context of an existing full site with limited additional capacity.
- 1.10 The need for the development and benefits arising are assessed across the scope of this report, but for the decision maker, the benefits in this case must clearly outweigh the conflict with the development plan in order provide a justifiable basis to grant permission. In officers' view, whilst recognising the significant harm caused and obvious policy conflicts derived by this proposed development, having regard in particular to the Case for Growth and the urgent economic need for the development in the location proposed, these material planning considerations outweigh the substantial level of harm identified. The proposed development would bring about significant economic and health benefits in the national interest.
- 1.11 The balance of these benefits in the circumstances of this application weighs in favour of a grant of planning permission and outweigh the conflict within national policy, national guidance and the development plan and the harm that in landscape, heritage and agricultural terms, the development would cause.

## **2.0 Site Description**

- 2.1 The site is approximately 127.5 ha in size and located within and adjacent to the Wellcome Genome Campus. The site plan is attached at appendix B. The existing Campus is a relatively modern collection of employment buildings which have developed over the last 25 years and which are orientated east-west, having developed southwards on the site over time from the landscaped setting of Hinxton Hall in the northern part of the site. The existing Campus comprises three main elements: a conference centre associated with Hinxton Hall and associated visitor facilities (and nursery) to the north; two academic institutes: the Wellcome Sanger Institute and the European Bioinformatics Institute (EMBL-EBI) and supporting amenities in its centre; and the EMBL-EBI South building, Ogilvie Building (home to the 100,000 Genomes Project) and BioData Innovation Centre (BIC) to the south, the most recent additions to the Campus.
- 2.2 To the north and west of the site is the village of Hinxton, to the southwest the village of Ickleton and to the south the village of Great Chesterford. The villages of Duxford and Whittlesford lie a short distance to the north, on the western side of the River Cam. The existing Campus and villages nearby are set within a mature landscape, forming a settlement pattern which follows the Cam valley and is framed by rising ground in an open, arable, strongly rural landscape.
- 2.3 The site is located in the south of the District, 13.5km south of Cambridge city centre. The application red line encompasses:

### *Expansion Land*

- 2.4 Separated from the existing Campus, the Expansion Land comprises a triangular shaped piece of arable farmland of approximately 113.5HA. It is defined by the northern boundary of Tichbault Road to the north, the A11 to the east and the A1301 to the west to a southerly point where it intersects with junction 9 of the M11. It is in agricultural use for the growing of cereals and onions in association with Hall Farm. It is generally open in character, comprising fields which face westwards as the land gradually rises from 35m AOD in the NW corner of the site adjacent to the A1301 to 58m AOD in the NE corner of the site adjacent to the A11(23m rise). The topography of the Expansion Land is of a subtle rounded chalkland landform rising and undulating from the Cam valley.
- 2.5 The Expansion Land includes a former railway cutting which is landscaped with mature trees and forms a wooded corridor. It runs in a SW-NE direction parallel to but set away from the alignment of the A11 and is dissected by a narrow valley running east-west across the site. Cutting across the centre of the Expansion Land from Tichbault Road in a north-south direction is a younger rectilinear landscaped belt of trees approximately 12 years of age, which eventually co-joins the southernmost railway woodland corridor. The fields are demarcated by thin hedgerows. Two single storey barn buildings and two large silo tanks are present within the north west corner of the Expansion Land, otherwise it is devoid of any buildings.

### *Campus Land*

- 2.6 This is an irregular, roughly 'D' shaped, parcel of land mainly within the southern area of the existing Campus of approximately 10.25 ha. The Campus Land comprises land within the existing Campus, including an area of land used for parking in association with the conference centre, the main entrance to the existing Campus, the reception building, a single storey cottage (East Lodge) curtilage listed, internal access road, car park, undeveloped hardstanding, landscaped amenity space and grassland / scrub. It is largely flat albeit continues in its southern portion to gently drop down towards the river Cam in the west.

### *A1301, New Road and Access*

- 2.7 The red line extends to include a long stretch of the A1301 close to junction 9 of the M11 to North End Road in Hinxton and a short stretch of New Road where it meets the southern extent of High Street, Hinxton. These works amount to approximately 4.2 ha of land. The access to the existing Campus is currently taken from the A1301 road via a three-arm roundabout. Agricultural access to the Expansion Land is currently gained from three gated access points directly from the A1301.

## **3.0 Land Uses and Constraints**

- 3.1 The Expansion Land is located in the open countryside, outside the Development Framework of Hinxton. It is not green belt land. The Campus Land part of the application site is contained within an Established Employment Area which surrounds the existing Campus and extends to its southern boundary adjacent to the sewerage treatment works.
- 3.2 Both the Expansion Land and Campus Land lie within Flood Zone 1 (areas that have a less than 1 in 1000 year annual probability of experiencing flooding). Higher risk areas of Flood Zones 2 and 3 lie close to the western boundary of the

existing Campus near to the river Cam. A large part of the Expansion Land lies in groundwater source protection zone 2 (outer protection zone).

- 3.3 The Environmental Statement (ES) confirms that there are no statutory ecological designations within the site. The closest designated site is Hildersham Woods Site of Special Scientific Interest (SSSI) approximately 2.4km to the east. None of the trees within the part of the conservation area which extends into the site are subject to individual Tree Preservation Orders (TPOs), however, trees in conservation areas are protected by the provision in Section 211 of the Town and Country Planning Act 1990.
- 3.4 No public right of way crosses any part of the site. Tichbault Road forms a permissive path for local residents and a vehicular access for businesses and residential properties including Hinxtton Grange and those behind it. A byway skirts the southern end of the Campus Land, running east from Ickleton to emerge on the A1301, 200m south of the existing entrance into the Campus.
- 3.5 The site lies within the Imperial War Museum Duxford Air Safeguarding Zone 2, where there is a height restriction of 45m.

#### *Adjacent Land Uses*

- 3.6 To the north of the Expansion Land is arable land surrounding Hinxtton Grange (a historic grade II house and garden) which is the subject of the current appeal relating to the AgriTech park. Further to the north is the A505, connecting the A1301 at the 'McDonald's' roundabout. The A505 runs in an east-west alignment connecting M11 junction 10 to the west and beyond and the A11 to the east. Whittlesford Parkway railway station is located north off the A505 approximately 3.7km north west of the application site and provides the primary access to the national rail network.
- 3.7 Beyond the A11 and on rising land to the east of the site is the proposed allocation for the North Uttlesford Garden Community (NUGC) including for 5,000 houses, over circa 450 ha of land. This proposed allocation is contained within Uttlesford District Council administrative area which is defined in this part of its District by the A11. The proposed allocation runs parallel to the A11 marginally beyond Tichbault Road to the north and runs south along the northern side of the B184 from Stump Cross.
- 3.8 To the south of the Campus Land is a byway, providing access to the Great Chesterford Sewage Treatment Works (STW). Further to the south is the village of Great Chesterford which accommodates a railway station approximately 2.8km south of the site.
- 3.9 To the west is the River Cam and associated County Wildlife Site and Wellcome Wetlands Nature Reserve established in 2005 to provide ecological enhancement and compensatory flood storage. It is managed by the Wellcome Trust and Cambridgeshire Wildlife Trust. Further to the west is the West Anglia mainline. This runs between Cambridge (to the north) and London Liverpool Street (south) whilst also branching off to serve London Stansted Airport. It serves both railway stations at Great Chesterford and Whittlesford Parkway, albeit the frequency of service to the former is more limited.

#### *Heritage Constraints*

- 3.10 All three nearby villages of Hinxton, Ickleton and Great Chesterford have designated conservation areas. The closest of these is Hinxton Conservation Area, which lies to the west of the Expansion Land and incorporates most of the historic village of Hinxton. It extends south halfway into the existing Campus and out towards the A1301 where it cuts around the Church of St Mary and St John (Grade II\*). To the north it stops at the beginning of North End Road.
- 3.11 Within Hinxton and on the existing Campus is the Grade II\* listed Hinxton Hall, its stables and walled garden, which have been converted for use as conference and accommodation facilities. These lie just outside the application site. Hinxton contains numerous listed buildings including the Hinxton Church noted above, which at 20m tall, is set back from and on the eastern side of the High Street. Its tower can be seen from the Expansion Land. The application site, including the Expansion Land, form part of the immediate setting to Hinxton Hall, Hinxton Conservation Area and the Hinxton Church of St Mary and St John.
- 3.12 Hinxton Grange, a Grade II manor house, lies to the north of the Expansion Land and is flanked by associated designed parkland on its western side, together with a formal tree avenue linking to the A1301.
- 3.13 Figure 3.2, chapter 3 of the main report to the ES provides an overview map of the heritage and other constraints within and near to the application site. It is attached to appendix C of this report. The Cultural Heritage section of the assessment identifies in greater detail the extent of the heritage constraints applicable to the site.

#### **4.0 Relevant Planning History**

- 4.1 There is an extensive planning history dating back to 1949 in relation to the existing Campus site. Wellcome purchased the site upon which the existing Campus stands in 1992 which at the time comprised various existing buildings, including laboratories and supporting development such as a nursery.
- 4.2 The key planning history for the existing Campus is as follows:

S/1728/93/F	Research and development facilities (Use class B1(b), together with Access, Estate Roads, Parking and Landscaping.	Approved 22-April-1994
S/1859/93/F	Change of use of Hinxton Hall to provide ancillary offices and residential accommodation for the conference centre (Class C2).	Approved 10-Jul-1995
S/1896/93/F	Research and development facilities (Use class B1(b), together with Access, Estate Roads, Parking and Landscaping.	Approved 22-April-1994
S/1562/93/O	Planning permission granted for restoration of Hinxton Hall, the stables, Game Larder and North Lodge for conference training, dining and residential accommodation, together with new residential accommodation (Class C2) and new access and roundabout on the A1301.	Approved 14-June-1994
S/0888/97/O	Erection of Research & Development	Appeal against

	Facilities (Class B1 (b)) Ancillary Leisure & Central facilities, open space & landscaping & Associated Drainage & Access Works Outline, appeal, called in by the Secretary of State and heard at a Public Inquiry in June 1998 and re-opened in March 1999.	non-determination. Appeal dismissed. 08/09/1997
S/0790/02/O	<p>Outline application for Southfield permission, 27,000 sq.m (GEA) use class B1, together with ancillary facilities, open space, landscaping and associated drainage, infrastructure and access works (associated S106 agreement 5 Nov 2002, associated S106 UU 5<sup>th</sup> December 2002 (see commentary below)). The proposed accommodation included:</p> <ul style="list-style-type: none"> <li>-an academic building totalling 10,000 gross sq.m comprising research laboratories, a research facility and data centre;</li> <li>-an Innovation Centre of 5,000 gross sq.m for 'start up' companies;</li> <li>-'Grow On' space totalling 9,000 gross sq.m for occupiers emerging from the Innovation Centre, or elsewhere in the next stage of development; and</li> <li>-ancillary facilities totalling 3,000 gross sq.m to primarily serve the extension, but located so as to also serve staff at the Genome Campus.</li> </ul>	Approved 02-Dec-2002
S/1585/02/RM	<p>Phase 1: Reserved matters application (associated with S/0790/02/O) for erection of buildings for research and development (B1b), together with ancillary facilities and infrastructure. Comprising circa 12,600 sq.m of research space, comprising the erection of an academic building (9,864 gross sq.m), a reception building (circa 3,000 gross sq.m), a Market Square and under and over ground car parking and site facilities. This part of the scheme has been developed and is now occupied and operational.</p> <p>(associated deed of variation S106 dated 16 June 2005 in relation to temporary works, including 6,000m<sup>3</sup> sub-soil and haul road)</p>	Approved 07-Mar-2003
S/2067/05/F	Variation of Condition 1 of planning permission S/0790/02/0 to allow a further	Approved 30-Jan-2006

	period of 3 years for the submission of reserved matters and the commencement of development for erection of buildings for research and development together with ancillary facilities and infrastructure (associated deed of variation to carry through the obligations contained in the S106 of 5 Nov 2002).	Application lapsed on 30 January 2009
S/1204/09/O	Following the lapse of 2067/05/F, this further outline application was submitted for the erection of buildings for research and development together with ancillary facilities and infrastructure and associated work. It comprised the same description and scale of development as the 2002 and 2006 outline planning permissions excluding Phase 1 and associated works. Specifically, the application proposed an extension to the existing Genome Campus providing circa 14,000 gross sq.m of accommodation within Use Class B1(b) and with ancillary works comprising additional parking, landscaping, sports facilities, drainage, plant and infrastructure works	Approved 10-Dec-2009
S/0031/09/F	Rear Extension to existing Conference Centre, Extension to Existing Dining Roo, New 64 Bedroomed Residential Block & Infrastructure & Landscaping. The additional bedrooms took the total number of residential bedrooms up to 136.	Approved 27-Nov-2009
S/0022/09/LB	Alterations and extension to dining room (Hinxton Hall) & to conference centre (*former stables and walled garden) for new meeting room & Exhibition space. Create door opening through wall. Application associated with S/0031/09	Approved 07-Oct-2009
S/2013/10/RM	Phase 2: Erection of Buildings for Research and Development, Landscaping and Associated Infrastructure (Reserved Matters Following Outline Approval reference S/1204/09/O, (This permission was for the Technical Hub for EBI South (a new biological data centre for the UK, 4,854 sq.m, 3 storeys, 13.25m high)	Approved 07-June-2011
S/1099/14/RM	Phase 3: Erection of Research & Development Buildings with Ancillary Facilities and Infrastructure. This was for a 3,293 sq.m building (known as the BIC building, and includes a DNA sequencing facility) which now forms the southernmost building on Southfield. It included a	Approved 30-July-2014

	1,136sq.m integrated energy centre. It is 3 storeys in height and has a total height of 14.5m.	
S/2209/18/E2	Scoping request for the proposed development.	17 July 18 & 19 Nov 2019

*Relevance of Unilateral Undertaking (5 Dec 2002)*

- 4.3 Representations have been made in relation to a S106 Unilateral Undertaking (UU) dated 5<sup>th</sup> December 2002, entered into by Wellcome Trust Limited (WTL) in respect of its Hinxton Estate. In the S106, WTL covenant not to change the use of the Hinxton Estate or any part of it except in accordance with the Local Plan or under a Development Order or in accordance with planning permission granted by the Council. The S106 binds successors in title.
- 4.4 The Hinxton Estate comprises 1) a large triangular shaped area of land including all of the Expansion Land, the land subject to the recent AgriTech appeal proposed by SmithsonHill and further land to the north of the appeal site (south of the A505), and 2) a roughly rectangular area of land to the west of the A1301, east of the railway and north of Hinxton, extending close to the A505 (excluding land adjacent to Whittlesford Parkway Station East side platform where it extends underneath the A505 bridge north of the river Cam and the McDonalds/service station land. Council records show that the UU was entered into at a time when the WTL was seeking to sell Hinxton Grange and its associated farmland. This is set out in a letter from Peter Pereira Gray on behalf of WTL on 5 Sept 2002.
- 4.5 Representations argue that the current application is a breach of the spirit and intention of the agreement reached in 2002 and have queried its relevance in relation to both the AgriTech appeal and this application. In response to this, the following three points should be considered:
- The UU still applies to the Hinxton Estate and for the avoidance of doubt, following the sale of the land now the subject of the Agri-Tech appeal, the UU continues to have effect in binding successors in title to the land.
  - The UU was not required for the granting the 2002 planning permission in order to mitigate the impacts of the scheme (S/0790/02/O), having being entered into on 5 Dec 2002, post the issuing of the respective decision notice (2 Dec 2002), without reference to it and applicable to land outside the outline application site. It appears to have been offered in order to address local concerns about possible future use of the land. There is a separate S106 agreement pursuant to the 2002 application which secures among other matters highways works and a Green Travel Plan.
  - The UU envisages a number of scenarios within which development can come forward on the Hinxton Estate, such as a grant of planning permission by the Council.
- 4.6 As such, the UU does not seek to hinder development of the land to which it is subject indefinitely but rather sets out a number of scenarios under which a change of use could come forward without breaching its terms. The UU is a material planning consideration but clearly there would be no breach of its terms should the Council grant planning permission. In the scenario of a subsequent appeal being made against any refusal of this planning application, it would be for

that decision maker to attribute weight accordingly but this notwithstanding there is a separate process required for seeking to remove or amend an obligation under S106A of the Town and Country Planning Act. It is not for the Planning Committee to pre-judge how the Council might approach the assessment of any subsequent S106A application, either in the scenario where any subsequent appeal is allowed or in any other circumstance. The existence of the UU should not be a determining factor in how the Planning Committee approaches its assessment of the application.

#### *Remaining Floorspace*

- 4.7 Only 1,185 sq.m remains of the most recent outline permission S/1204/09/O (i.e. floorspace that has not been approved in subsequent reserved matters applications). This is relevant in terms of the applicant's Case for Growth and the existing demand for further floorspace.

#### *Expansion Land History*

- 4.8 There is no planning history relevant to the Expansion Land.

#### *Hanley Grange ECO Town*

- 4.9 There is no planning history for this proposal, which emerged around 2008 with initial proposals for 8,000 homes rising to 12,800 homes. The site was owned in part by a development company, Jarrow Investments, which worked closely with supermarket giant Tesco in a bid to be one of the 15 shortlisted schemes competing for eco-town status. Hanley Grange occupied a large triangular parcel of land bound by the A1301, A11 and A505. It thus included the Expansion Land part of this application. Wellcome Trust announced it would not sell its land to Tesco and the proposal was not put forward as an application. Despite third party comments to the contrary, the Hanley Grange ECO Town proposal has no bearing on the consideration of this application.

### **5.0 Description of the Proposal**

- 5.1 Wellcome is seeking outline planning permission to expand its existing Genome Campus, currently set within the estate of Hinxton Hall on 125-acres of landscaped parkland bordering the river Cam. The Campus is the world's leading centre for genomics research, having played a central role in the Human Genome Project (1990-2003), which read and recorded the complete sequence of DNA in an individual for the first time. It currently employs approximately 2,600 staff utilising 75,000 sq.m of existing scientific research, translation, education and support facilities, which has developed over the last 25 years. The Case for Growth - one of the documents submitted in support of the application - explains the need for the proposal and sets out a vision which is *'to build on the scientific foundations of the campus to become the international centre for scientific, business, cultural and educational activities emanating from Genomes and Biodata'*. The application is put forward by Wellcome as a unique opportunity in the interests of world health and of the UK economy. Planning permission is sought on an urgent basis to enable the UK to continue to compete in the global genomics market.
- 5.2 The sought permission is for a phased, mixed-use development which would provide up to a further 150,000 sq.m GEA (gross external area) of new research and translation floorspace – resulting in 6,800 people working on the expanded Campus - and up to 1,500 new homes. The new floorspace is proposed to be

restricted to *'extend the principle on which Wellcome has operated on the existing campus (Gateway Policy) to its extension to ensure only those firms and occupiers who fit within the vision for the proposed development operate from the site'*. This commitment is embodied within a proposed Gateway condition set out within appendix A and ensures that subsequent occupation of the employment floorspace is controlled and relates specifically to the needs of the expanded Campus. Likewise, the housing component being proposed is for existing and future Campus workers and will internalise some trips from people working and living within the site. The housing is not put forward to meet general market housing needs but specifically to meet existing and future needs – including affordable needs - of Campus employees, to enable retention of staff and provide a competitive offer for future employees given that the Campus is competing for firms and talent on a global basis. The controls to ensure this are discussed in more detail from paragraph 11.17 onwards.

- 5.3 The proposal also includes the following range of supporting uses: community and social infrastructure provision; conference facilities; hotel; retail; and leisure uses. The following environmental/infrastructure provisions are also included: landscaping and public realm, areas for SUDs and biodiversity enhancements; energy centre and utilities; site access (vehicular, cyclist and pedestrian), car and cycle parking and highways improvements; early landscape and enabling works; and associated works.
- 5.4 The full description of development as proposed is set out on the front page of this report. All matters are reserved for subsequent approval.
- 5.5 The application was submitted in December 2018 and subsequently amended/updated in April and August 2019 to reflect consultation responses and officer negotiations. The amendments have included: parameter plan revisions including a reduction in the maximum height and height distribution; an updated Development Specification (providing information on the land uses and maximum floor spaces proposed); a Design and Access Statement (DAS) addendum and a full consolidated version; a Health Impact Assessment (HIA) addendum; further information in relation to the ES including in relation to ecology, biodiversity, trees, archaeology, traffic data, air quality and revised LVIA visualisations; Briefing Note responding to the consultation; Draft Heads of Terms; revised Housing Statement; Viability Statement; and a document entitled Response to the Parishes. The amendments and further information have been subject to further consultation as appropriate.
- 5.6 As amended, the application as put forward for consideration comprises:

Document	Issued	Note
Application Form Ownership Certificates	Dec 18	-
Application drawings	Dec 18 and April 19	This includes parameter plans (PP's) 1-5 covering built development, height, green infrastructure, movement and highways. PP's 1-5 are put forward for approval.  A no. of plans are put forward for information/illustrative

		purposes including the masterplan
Case for Growth December	Dec 18	
Development Specification	April 2019	See paragraph 5.8 below. For Approval
Design and Access Statement (DAS)	December 2018, Addendum April 2019, Consolidated August 19	
Energy Statement	Dec 18	
Environmental Statement	Dec 18 and April 19	See commentary on what this includes at paragraph 6.9 below.
Draft Estate Management Strategy	Dec 18	
Foul Sewerage and Utilities Assessment	Dec 18	
Health Impact Assessment and Addendum	Dec 18 and April 19	
Housing Statement	August 19	
Planning Statement including: -Policy Designations -Town Centre Uses Assessment -Social Infrastructure Strategy and Public Access Statement -Draft Section 106 Heads of Terms	Dec 18      S106 HoT's v6 revised August 19	
Statement of Community Involvement	Dec 18	
Sustainability Statement	Dec 18	
Viability Assessment	August 19	
Response to Parishes	August 19	
Briefing Note, Response to Consultation	August 19	

### *Plans*

- 5.7 The plans submitted in support of the proposal are set out below. They are intended to be read alongside the Development Specification which is summarised at paragraph 5.8 below.

Drawing Title	Ref	Rev	Status
<b>Site Location Plan</b>	WGC-ARP-XX-XX-DR-AX-1	0	Information
Defines the extent of the planning application site boundary.			

<b>Existing Site Plan</b>	WGC-ARP-XX-XX-DR-AX-2	0	Information
Identifies some of the key features and buildings within the application site.			
<b>Key Parameter Plan (PP1)</b>	WGC-ARP-XX-XX-DR-AX-3	1	Approval
PP1: Defines the maximum extent of the Development Area (extent of built development). It does this by identifying three Development Areas (1-3) which are to be subject to further Development Area Briefs and Design Guides. Development areas 1 and 3 are located on the Expansion Land. Development Area 2 is located within the Campus Land. PP1 also identifies indicative locations of neighbourhood or retail / leisure focus, indicative access/crossing points and retained buildings.			
<b>Maximum Building Heights Parameter Plan (PP2)</b>	WGC-ARP-XX-XX-DR-AX-4	1	Approval
PP2: Defines zones of maximum building heights. Two zones are proposed, one which allows for buildings up to 11m and one which allows for buildings up to 16m from proposed ground level.			
<b>Green Infrastructure Parameter Plan (PP3)</b>	WGC-ARP-XX-XX-DR-AX-5	1	Approval
PP3: Defines areas of retained and enhanced vegetation, a buffer zone with bunding, acoustic bund, retained arable land with new hedgerows, natural and semi-natural space and semi-natural open space or space for outdoor sports. It shows the location of a common adjacent to the A1301 and the approximate location of a green corridor with spurs off it running through the centre of the site. Structural edge planting is shown around the Expansion Land.			
<b>Movement Network Parameter Plan (PP4)</b>	Approval WGC-ARP-XX-XX-DR-AX-6	1	Approval
PP4: Shows indicative primary and secondary routes within the site and new connection points for pedestrians, cyclists and vehicles.			
<b>Highways Improvements, Parameter Plan (PP5)</b>	Approval WGC-VEC-XX-XX-DR-AX-7	1	Approval
PP5: Defines an area within which highways works including for the A1301 and New Road are to be carried out. The designs shown for the highways works are indicative.			
<b>Composite Plan of Parameter Plans</b>	Information WGC-ARP-XX-XX-DR-AX-8	1	Information
A combination of all the parameter plans.			
<b>Indicative Early Landscape Works Plan, Indicative</b>	WGC-ARP-XX-XX-DR-AX-9	0	Indicative

Shows existing vegetation, vegetation to be removed or relocated, the indicative location of proposed early planting (mainly around the western and southern edge of the Dev. Area 1 facing the A1301) and proposed early enhancements to existing hedgerows along the A1301.			
<b>Illustrative Masterplan</b>	WGC-ARP-XX-XX-DR-AX-10	0	Illustrative
Shows one way in which the site, in accordance with the parameter plans, could be developed out.			
<b>Existing Topography Plan</b>	WGC-BUR-XX-XX-DR-AX-11	0	Information
Show the existing topography at 1m intervals			
<b>Indicative Proposed Topography Plan</b>	WGC-BUR-XX-XX-DR-AX-12	1	Indicative
Shows indicative changes in level across the site, including an area where the proposed bunding in two areas (bund A and bund B) adjacent to the A11 would be implemented.			

Development Specification

- 5.8 This includes a description of development which defines the breakdown of the uses and maximum floorspaces applied for. These are contained within a land use schedule. It also sets out a number of Development Principles by which any subsequent reserved matters applications must abide. The Development Specification is put forward for approval.

*Land Use Schedule*

- 5.9 Maximum land use floorspaces are defined within the Development Specification as follows:

Use	Amount
<b>Research and Translation (employment) space1 (Use Classes B1, B2 and B8)</b>	Up to 150,000 square metres (sq.m) Gross External Area (GEA)
<b>Residential (Use Class C3)</b>	Up to 1,500 dwellings
<b>Supporting Uses:</b>	31,100 sq.m GEA, including:
- Retail (Use Classes A1, A2, A3, A4)	- Up to 3,500 sq.m GEA
- Hotel (Use Class C1)	- Up to 5,000 sq.m GEA
- Non-residential institutions, and community and leisure, including nursery, conference facility, and education (Use Class D1/D2)	- Up to 22,750 sq.m GEA

<b>Energy Centre and utilities</b>	Up to 5,000 sq.m GEA

*Development Principles*

- 5.10 The Development Specification states that the Development Principles are intended to inform the preparation of Development Area Briefs, Design Guides and reserved matters applications. Subsequent applications and design work are required (via proposed conditions) to demonstrate conformity with the Development Principles. The Development Principles are not intended to fix a specific design outcome at outline planning stage but set performance criteria for the detailed design stages ensuring that a high-quality development is delivered. The principles are organised thematically, covering topics such as land-use, parking, building heights, open space etc. They have been assessed and agreed by officers and are set out in more detail in the Design and Layout section of the officer assessment from paragraph 13.26 onwards.

*Structure*

- 5.11 The applicant seeks a flexible planning permission to help respond to a rapidly changing scientific, institutional and commercial environment. As such, and not unlike many outline applications, the plans and supporting documents seek to establish guiding principles and parameters. For example, the plans put forward for approval only provide maximum parameters for the development and do not define but rather guide the location of land uses through a set of Development Principles attached to the Development Specification. Precise locations for buildings and their design are to be developed at the reserved matters stage. This is intended to allow for the flexibility to bring forward a development that can respond to the needs of its occupiers, closer to the point of delivery.
- 5.12 The applicant proposes three key stages in the approval process:
- 1: Grant of outline planning permission;
  - 2: Development Area Briefs and Design Guides; and
  - 3: Reserved matters applications.
- 5.13 The discharge of planning conditions and section 106 planning obligations would either relate to the outline permission or those attached at the reserved matters stages. The applicant envisages the delivery of the component parts of the scheme would commence, starting with early landscape works; followed by enabling works and then the delivery of buildings and open spaces.

*Development Area Briefs and Design Guides*

- 5.14 These are proposed to be prepared for each Development Area (or as otherwise agreed) to help define and inform subsequent reserved matters applications. Development Area Briefs (DAB's) are to provide the following information: the size, quantum and location of uses within the relevant Development Area; the footprint of development parcels/blocks; the proportion and distribution of Campus market and Campus affordable housing, including mix and tenure; community facilities provision; consistency with the ES; a transport report and proposed transport mitigation; open space and landscaping provisions; phasing;

compliance statement with design principles, Parameter Plans (PP's) and other supporting strategies. The full specification setting out the requirements for DAB's and what is required from the Design Guide process are set out in Annexures to the proposed conditions at appendix A.

## **6.0 Environmental Impact Assessment (EIA)**

- 6.1 The application is accompanied by an Environmental Statement (ES) which has been prepared in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).
- 6.2 The EIA Regulations require the ES to identify the 'likely significant environmental effects' of a development. The Government's Planning Policy Guidance highlights that the ES should focus on the 'main' or 'significant' environmental effects only and that the ES should be proportionate. The ES comprises four parts including main reports, appendices (with supporting detailed technical information and figures in support of the main reports, visualisations (in respect of landscape and heritage impacts) and a Non-Technical Summary. This last document is included in appendix Q.

### *Scope*

- 6.3 An applicant who wishes to make an application for EIA development may request a Scoping Opinion from the local planning authority in accordance with Regulation 15 of the EIA Regulations. A Scoping Opinion sets out the local planning authority's opinion on the information that needs to be provided in the ES. A request for a Scoping Opinion was submitted to the Council on 5th June 2018 by Quod on behalf of Wellcome. It was accompanied by an EIA Scoping Report (dated June 2018).
- 6.4 Following a consultation process, the Council issued a scoping opinion on 17 July 2018, followed by a further scoping response on 19 Nov 2018. The applicant confirms (and officers are satisfied) that the ES submitted with the application is based on the most recent Scoping Opinion, which comprises the July 2018 Scoping Opinion, as amended by the further SCDC advice of 19 Nov 2018.

### *Temporal Scope, Phasing and Methodology*

- 6.5 The ES considers the likely significant effects of the proposed development during construction and once it is complete and operational. It has been assumed that the construction phase would extend over approximately 11 years. The principal assessment year for the EIA is based on completion of the whole proposed development and is assumed as 2031.
- 6.6 The ES states that the phasing of the proposed development is not certain at this stage and is likely to be linked to market demand. It envisages that construction of the proposed development would be undertaken in one continuous construction phase, rather than a series of defined spatial phases. Each technical assessment in the ES therefore assumes a notional 'worst-case' scenario with respect to the envisaged construction methods, location (proximity to sensitive receptors) and timing as outlined in Chapter 6: of the ES 'Construction'. Both temporary and permanent construction effects are identified.
- 6.7 The application is submitted in outline form with all matters reserved. The ES therefore assesses the maximum quantum, physical extent and development principles defined for the proposal, set out in the submitted parameter plans and

associated Development Specification which are put forward for approval. Detailed designs for the buildings, their scale, layout and appearance would be subject to future reserved matter applications and would be subject to principles agreed through a Design Guide, the details of which are set out and secured by proposed Annexure C of the draft conditions within appendix A of this report.

- 6.8 For each impact assessment for the topics as set out below, the maximum adverse scenario, in terms of generation of significant environmental effects, is identified from the proposed development parameters, and the assessment is undertaken on this basis.

*Topics*

- 6.9 The ES assesses the following topics:

Alternatives
Construction
Agricultural Land Quality and Soils
Cultural Heritage
Biodiversity
Landscape and Visual Impacts
Light Pollution
Transport
Air Quality
Noise and Vibration
Water Resources
Climate Change
Waste
Socio-Economics
Effect Interactions
Summary of Effects and Mitigation Measures

- 6.10 The ES was updated in April 2019. The updates to the ES and revised supporting planning documents put forward by the applicant are as para 5.5.

*Cumulative Assessment*

- 6.11 As set out above, the Council issued its last formal scoping response to the applicant on 19 Nov. 2018. This clarified which sites it considered should be included in the cumulative impact assessment for the ES. The scoping response confirmed that neither the proposal for North Uttlesford Garden Community (NUGC) nor the proposed AgriTech site at appeal and promoted by SmithsonHill should be scoped into the cumulative assessment.
- 6.12 The scope of the cumulative assessment has been the subject of representations, including from Grosvenor, Terence O'Rourke on behalf of SmithsonHill, Uttlesford District Council (DC), Essex County Council and a number of parish councils, both as part of the scoping consultation undertaken by the Council and / or on consultation to the application. Most of these representations request a cumulative transport assessment with NUGC and AgriTech. Other representations also ask for cumulative landscape impact assessments with these two sites.
- 6.13 Representations made to the planning application also suggest a change in circumstances and have asked that the Council re-evaluates the scope of the ES.

The changes cited include that Uttlesford DC Local Plan (LP) has been submitted to the Inspectorate and is claimed to be at an advanced stage of preparation; NUGC is contained in the draft Uttlesford DC LP as an allocation for 5,000 houses. It is also argued that the Sustainability Appraisal (SA) supporting the Uttlesford DC LP has been updated to address previous deficiencies and that the SA determines that the spatial strategy is the most appropriate strategy thereby providing more certainty that NUGC will emerge.

- 6.14 For AgriTech, the appeal, which the Council resisted at a public inquiry, has not been determined and it is neither an existing nor an approved scheme. The Planning Inspectorate has confirmed that the Inspector's report to the Secretary of State (SoS) is timetabled to be submitted to the Secretary of State on or before 22 November 2019. There is no confirmed date, at present, for when the SoS will issue a decision in relation to AgriTech.
- 6.15 The EIA Regulations 2017 states that only existing or approved development should form part of an EIA for the purposes of cumulative assessment. Neither NUGC nor AgriTech constitute existing or approved development. Moreover, given that the AgriTech proposal has been refused planning permission and the subsequent appeal was strongly resisted by the Council and that the development plan including the NUGC has not been found sound or adopted, it is not considered necessary or appropriate for these two sites, which in terms of likely delivery are far from certain, to form part of the cumulative assessment within the ES.
- 6.16 Uttlesford DC confirm that the Stage 1 hearing sessions on matters including legal / procedural requirements, the spatial strategy and the Garden Communities have now been completed and the Inspectors' conclusions are expected by mid-October. Officers are of the view that whilst the Uttlesford DC LP has moved forward since the scoping opinion, this does not amount to NUGC constituting either an existing or approved development and it is neither necessary nor appropriate for NUGC to be included in the cumulative assessment in the ES.
- 6.17 As such, the ES, in assessing the effects of particular developments, has taken into account the consideration the following schemes:

List of cumulative schemes assessed within the EIA	Development Site
1	8 Greenacres, Duxford - planning reference S/0276/15/OL
2	Cambridge City Football Club football stadium, Sawston - planning reference S/2239/13/FL
3	Babraham Research Campus – planning references S/2016/11, S/0600/12/RM, S/0616/13/RM, S/0422/15/RM, S/1676/14/OL
4	Cambridge Biomedical Campus, Cambridge City – planning reference 16/0176/OUT
5	Sawston Trade Park – planning reference S/2284/17/OL
6	Granta Park – planning reference S/1110/15/OL
7	West Cambridge – planning reference Cavendish Building (17/1779/FUL), Shared Facilities Hub (17/1896/FUL), Civil Engineering Building (16/1811/FUL):

### *Implications for Cumulative Impact Assessment*

- 6.18 The mitigation, including the transport mitigation, proposed by Wellcome in the expansion of their Campus is not dependent on infrastructure provision being provided by either NUGC or AgriTech. Neither are NUGC or AgriTech dependent on Wellcome's mitigation. Each proposal site has to 'wash its own face' in terms of mitigation of impact.
- 6.19 Should Wellcome gain planning permission, its status would change to an approved development and Uttlesford DC would be advised accordingly.
- 6.20 The transport consultants TPA, working on behalf of SmithsonHill for AgriTech, elected to undertake a cumulative impact assessment of the Wellcome proposal. The County Council has accepted in the Statement of Common Ground on Transport Planning Matters (para 2.13) as evidence to the Inquiry for AgriTech that the proposed mitigation, including that for McDonald's roundabout and along the A505 corridor, is sufficient to accommodate the transport impacts from both AgriTech and Wellcome. The reasons for this are set out at para. 15.52.
- 6.21 Any S106 for Wellcome would have to contain a number of options for delivery of transport mitigation along the A505 corridor and be suitably flexible to take account of a number of scenarios including the outcome of the AgriTech inquiry and, if granted, proposed delivery timescales for the two sites. The various scenarios are set out from paragraph 15.55 onwards.

## **7.0 Policy and Material Considerations**

- 7.1 Planning law requires that the application is determined in accordance with the development plan, unless material considerations indicate otherwise.
- 7.2 The presumption in favour of sustainable development in the NPPF does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not be granted unless material considerations indicate otherwise.

### **National Planning Policy Advice and Guidance (NPPF and NPPG)**

- 7.2 All relevant guidance is set out in appendix G.

### **South Cambridgeshire Local Plan 2018**

- 7.3 All relevant policies are set out in appendix H.

### **Supplementary Planning Documents**

- 7.4 All supplementary documents are set out in appendix I

### **Material Considerations**

- 7.5 All relevant material considerations are set out in appendix I.

## **8.0 Publicity**

### South Cambridgeshire District Council

Advertisement	Yes
Adjoining Owners	Yes
Site Notice Displayed	Yes
Public Meeting/Exhibition	Yes
Southern Clusters Briefing	17 Jan 19 (Public)
Case for Growth Briefing	31 May 19 (Public)
Housing Briefing	1 August 19 (Officer-Member Briefing)
Transport Briefing	12 Sept 19 (Officer-Member Briefing)
Southern Clusters Briefing	15 Oct 19 (Public)
Viability Briefing	18 Oct 19 (Officer-Member Briefing)

### **Statement of Community Involvement**

- 8.1 The application has been subject to extensive consultation and publicity. It is accompanied by a Statement of Community Involvement (SCI) which sets out the extent and approach to stakeholder engagement undertaken by Wellcome and summarises the outcomes around planning themes. It includes appendices which include all the consultation material used at the four different stages of consultation undertaken.
- 8.2 As part of the consultation responses to the application, some Parish Councils (including Hinxton) have expressed concern with the community engagement process and the resultant outcome of this. It is alleged that concerns about traffic congestion, the need for public transport, the scale of the proposal and commercialisation of the site have been ignored. It is also alleged that the proposal has grown over the course of the consultation process and no serious effort has been made by Wellcome to develop a 'partnership' with the parish community.
- 8.3 In the applicant's 'Response to the Parishes' of August 2019, it sets out the following:
- 8.4 *'Engagement with the local Parishes, on the current masterplan, began in 2017. The consultation programme involved a mixture of Existing Campus-focused and community-focused events to gain a clear understanding of the respective views of both the local population and members of staff on the proposal to expand the Existing Campus. This included a programme of pop-up events on the Existing Campus, community workshops, parish council meetings and briefings, Campus focus groups, public exhibitions, and online surveys over a 10-month period.'*
- 8.5 *12.2 Stakeholder meetings were held on an ongoing basis throughout the process and included meetings with parish council representatives and local residents. Invitations to take part in each stage of consultation were sent to c.6,000 households covering seven parishes. The Statement of Community Involvement identifies that 20 local organisations and 7 parish councils were engaged in the process and that approximately 130 local people took part in each of the four stages of consultation, as well as 400 Campus staff.*
- *Stage 1, January 2018: The first stage of consultation was focused upon understanding Campus and community priorities, concerns and aspirations.*

- *Stage 2, March 2018: The second stage was focussed upon the site approach, masterplan principles and concept, including the extent of development and the proposed location of development areas across the site.*
- *Stage 3, June 2018: The third stage presented the initial emerging masterplan proposals. Virtual Reality was used to allow participants to ‘walk’ around and explore the different character areas of the Site to provide a sense of how the Proposed Development could look. The information included the number of homes expected to be provided (1,500) along with a substantial amount of Research and Translation space. This stage also included the illustrative masterplan which showed the extent of land to be developed.*
- *Stage 4, October 2018: The final stage of consultation was used to provide information on what would be submitted as part of the planning application, the amount of research and translation space proposed (150,000m<sup>2</sup>) [on] the draft parameter drawings*
- *...The EIA Scoping Report (dated June 2018) set out that the proposals were expected to include 175,000 sq.m of Research and Translation uses and up to 1,500 new homes.*

8.6 It is disappointing that the outcome of the community involvement from the perspective of the nearby parish councils is a negative one. The resultant issues of traffic and transport, scale and commercialisation are, however, now for members of the Planning Committee to resolve in their deliberation of the application.

8.7 In terms of Wellcome’s engagement with the existing Campus community, the SCI summarises the responses from two Campus surveys undertaken as part of stages 1 and 3 (outlined above). These gained 489 and 422 responses respectively. In particular, section 5.2 of the SCI states that as part of stage 1, a survey was sent to all Campus staff asking if they would “consider living on an expanded Campus if the right type of housing was provided”. Of the 476 Campus staff who responded to this particular question, 33% (156) responded ‘yes’ to living on Campus, 22% (105) were ‘not sure’ and 45% (215) responded ‘no’. The SCI states that ‘*A strong theme to emerge from those who said ‘no’ and ‘not sure’ was that there would need to be improvements to both the amenities and connections available to create a community they would consider moving to.*’ A similar survey question was carried out in stage 3 and produced similar results.

8.8 The SCI is a comprehensive document and provides a wide range of information which has informed the application and subsequent amendments to it, including information regarding the household income profile (Q12, Stage 3, page 122) of Campus workers and this is discussed as part of the housing chapter of this report.

8.9 A summary of all consultation responses has been included in appendices J - O. Full responses are available on the public file.

## 9.0 Consultation Summary

- 9.1 Due to the number and detail of the representations and consultation responses received in respect of the application, detailed summaries of responses in respect of SCDC officers, Cambs County Council, external consultees, parish councils, neighbour representations and from life science and economic organisations are provided in appendices J – O inclusive. The following section provides a high-level summary of the responses received.

### Overview

#### Parish and Neighbour Representations

- 9.2 12 individual objections from parish councils have been received and 2 parish responses are in support. The objections are substantive and strongly framed. The parish councils closest to the application site have raised significant objections and these include from Hinxton, Ickleton and Great Chesterford but also further afield.
- 9.3 In addition to the parishes, a significant number of individual letters of objection have been received from local residents. The representations are mainly from residents of Hinxton and Ickleton.
- 9.4 The main issues raised by the parishes and residents concern the following:
- Principle
  - Traffic impacts and mitigation (in particular rat-running)
  - Quantum of development
  - Building heights
  - Landscape and character
  - Loss of agricultural land
  - Impact on biodiversity
  - Cumulative impact (AgriTech/NUGC)
  - Need for housing
  - Absence of affordable housing/housing ties
  - Impacts on schools and healthcare
  - Justification of Case for Growth and increased commercialisation of the Campus
  - Environment (flooding, sewerage, dust, noise, light pollution, water resource)
  - Heritage Impacts
  - Community engagement
  - Lack of clarity regarding community facility provision
- 9.5 Many of the parish council and third-party responses recognise the importance of the medical and other genome-related research work undertaken at the Campus. There is general acceptance that the continuation of the work of the Campus may require moderate and appropriate growth.
- 9.6 Issues of principle raised relate to the fact the scheme proposal (Expansion Land part) is on unallocated agricultural land, outside the Development Framework and neither the employment, housing nor supporting uses are supported by the Council's spatial strategies. It is argued that there is a strong policy presumption against the principle of the proposal and that any development should come forward as an allocation and considered cumulatively with other emerging allocations and major development sites.

- 9.7 Issues relating to traffic, transport and associated mitigation extend throughout the responses and form a significant part of the overall objections. Most of the objections raise issues with existing congestion on the network, particularly queuing at McDonald's roundabout and along the A505 from the M11 to the A11 at peak hours. Parishes and local representations cite rat-running at peak hours as a key existing issue, which is backed up by traffic counts taken within the locality. Concern is expressed that rat running through the nearby local villages and its associated harmful impacts (e.g. noise, fumes, vibration, health, highway safety, damage to property), particularly in Ickleton, Duxford and Hinxtion but also further afield, will substantially increase as a result of the proposal. Significant concerns are raised with the Transport Assessment (TA) submitted alongside the application and with the adequacy and extent of the mitigation and overly optimistic Travel Plan targets.
- 9.8 Most parishes and third parties consider that congestion will get worse as a result of the proposal and there is scepticism concerning the methodology and reliability of the traffic data that has fed into the TA, including from off-site impacts arising from the housing. Many responses cite the need for strategic solutions to the network including suggestions to provide a dual carriageway for the A505 and provide an improvement to the M11 junction 9 to allow northbound access onto the M11 from Stumps Cross and southbound egress onto Stumps Cross from the M11. A more joined-up (cumulative) assessment process and approach to solutions across the affected parts of the highway network from strategic sites, including NUGC, AgriTech and Huawei is sought. The mitigation proposed is not seen as being of benefit to local residents and neither is it seen as radical enough to alleviate existing and future problems on the network.
- 9.9 Many of the parishes and third parties also express significant concern regarding the Case for Growth, including the scale and need for the quantum of housing (ten times the number of houses within Hinxtion) and the justification for the scale and nature of sought employment provision. The new employment space is viewed as significantly shifting the nature of the work undertaken at the Campus from a mostly research led Campus to one that is dominated by an increased commercialisation and which would result in weaker links with the existing research institutes. Given the proposed shift in nature of the existing Campus eco-system and advances in IT, co-locational benefits for expanding the existing Campus are not accepted as justification to develop the site. There are significant concerns regarding the need for the housing, its affordability and whether in fact it will be for the open market and more generally with the impacts on the existing community in terms of schools and healthcare. The application is viewed by many of the parishes and third parties as a commercially led venture by Wellcome's investment arm.
- 9.10 Several parishes and third parties express concern regarding the significant landscape and visual harm that would arise from the proposal. The concerns are echoed more formally in the Council's own landscape consultant's advice (see para. 9.20 below). Following amendments to the scheme, which have removed the higher parameter plan height of 20m and shifted the distribution of height, the concerns remain; the scheme would be highly visible on open, rising land and it would be significantly out of character. Works to the A1301 (traffic calming, new junctions, roundabouts, crossings) would result in increased urbanisation.
- 9.11 The biodiversity and ecological stewardship elements of the proposal are questioned as to their methodology and value given the extent of built development that would arise. A wider package of improvements to the management of the surrounding countryside on land within Wellcome's control,

including access to it and improvements to alleviate flood risk within Hinxtton around the existing mill are sought.

- 9.12 Issues concerning community engagement are summarised in the Statement of Community Involvement section of this report (see para. 8.1). Matters concerning the existing unilateral undertaking covering the Expansion Land are dealt within in the planning history section of this report (see para 4.3).
- 9.13 Of those parishes that have responded to the April and August amendments of 2019, they do not consider that the amendments and further information have addressed the key issues. A further S106 letter has been received from Hinxtton Parish Council and detailed concerns have been raised regarding to the applicant's viability assessment. A strong rebuttal to the applicant's 'Response to Parishes' note has been issued by Hinxtton PC and which has also been criticised upon by Ickleton PC.
- 9.14 The issues raised are summarised in more detail in appendices M and N and are dealt with specifically within the officer assessment. The full responses to the application are available to view on the Council's website.

#### SCDC Officer Responses

- 9.15 Most of the internal SCDC responses to the scheme raise no objection subject to conditions and appropriate S106 controls. There are no objections from Environmental Health in respect of matters concerning air quality, contaminated land, noise and vibration, odour, light and waste management. The Development Officer (Health and Wellbeing) supports the applicant's Health Impact Assessment. The Sustainable Drainage Officer raises no objection and the Sustainable Communities and Wellbeing Officer is satisfied with the approach to community facilities and community support subject to a S106 which secures these elements and a Community Development and Support Strategy as set out from paragraph 12.39 onwards. The approach to the provision of open space within the site is also supported subject to a Sports and Play Strategy being agreed. There are no objections from Arboriculture or Waste Officers.
- 9.16 The Council's Sustainability Officer raises no objection subject to conditions. She states that the application shows a high level of ambition in relation to integrating the principles of sustainable design and construction into the design, taking things a step further through the introduction of the Restorative Sustainability approach (explained at para. 16.31). Resilience, sustainability and health and wellbeing are strongly embedded within the core development objectives and masterplan principles, with the applicant clearly taking a legacy landowner approach to development.
- 9.17 The Council's Urban Design Officer has assessed the plans, Dev. Specification, DAS and other supporting documents. She has been closely involved in the pre and post application process and supports the scheme. All issues raised have been resolved either through modifications to the plans/documents as part of the April 2019 submission or through the suggested conditions.
- 9.18 The Council's Ecology Officer originally raised concerns regarding the plans, the Development Specification, badger sett buffers and biodiversity calculations contained within the ES. Further information has been received and no objection is now raised subject to conditions.

- 9.19 The original housing offer was not accepted by the Head of Housing. Officers have worked with the applicant to negotiate a revised housing offer. A revised Housing Statement, together with a Viability Statement, was submitted as part of the August 2019 submissions. The housing offer is agreed with the Head of Housing subject to the satisfactory resolution of this through the S106 process in conjunction with a Sales and Lettings Policy.
- 9.20 There is an objection from the Council's landscape consultant (HBA). His advice is that the proposal would be very harmful to the local landscape character and visual amenity and that it contains built form of such scale and height that it could not be successfully mitigated over time and that the project has not been sufficiently strongly landscape led.
- 9.21 The Council's Heritage Officer has also raised an objection. She states that the development will cause a high degree of 'less than substantial' harm to the significance of Hinxton Conservation Area and cause a degree of 'less than substantial' harm to the significance of Hinxton Parish Church of St Mary & St John the Evangelist (Grade II\*), Ickleton Parish Church of St Mary Magdalen (Grade I), Ickleton Conservation Area, and to a lower degree Hinxton Hall (Grade II\*), due to inappropriate development in their setting.
- 9.22 The issues raised are summarised in more detail in appendix J and are dealt with specifically within the officer assessment. The full responses to the application are available to view on the Council's website.

#### Cambridgeshire County Council (CCC)

- 9.23 CCC has provided a range of comments across its departments including from: Transport; Education; New Communities; Library Services; Local Lead Flood Authority; Minerals and Waste; Archaeology; Public Rights of Way and Public Health.
- 9.24 County Transport initially raised a holding objection to the scheme as part of their first consultation response. Since then, further discussions and assessment have been undertaken and the trip rates, impact assessments for junctions (safety audit) / signal modelling review and the proposed mitigation has been agreed. No objection is raised by County Transport.
- 9.25 County Education has welcomed the proposed inclusion of space for a nursery to provide early years demand arising from the development. They seek a primary school on the site of up to a 2FE of capacity requiring a site area of 2.3ha together with financial contributions. The location of the primary school will be secured as part of the S106 process. Contributions are sought for a 1FE expansion towards Sawston Village College.
- 9.26 County New Communities seek financial contributions towards community support for new residents in the early phases of the development and have agreed the value of the equivalent provision to be provided by Wellcome directly. Library services seek the provision of a community building to meet the needs of a library and partner services together with a contribution towards furnishing and equipment. The County Lead Local Flood Authority (LLFA) has no objection in principle to the proposed development and concludes that the application demonstrates that surface water from the proposed development can be managed by conveying surface water runoff to bio-retention and attenuation areas around the development before infiltrating into the surrounding ground.

- 9.27 Other CCC consultees raise no objection subject to the imposition of suitable conditions.
- 9.28 The issues raised are summarised in more detail in appendix K and are dealt with specifically within the officer assessment. The full responses to the application are available to view on the Council's website.

#### External Consultees and Organisations

- 9.29 Objections have been received from Cambridge Past Present Future, Camcycle, Grosvenor (NUGC), Ickleton Society and Uttlesford DC. Concerns have been raised Essex County Council.
- 9.30 Many of the issues raised by these parties are summarised above and include references to issues concerning principle, the proposal not being plan led, the need for an Area Action Plan (AAP), better linkages and cumulative development assessment. The representations are individually summarised in appendix L and are dealt with within the officer assessment, primarily in terms of the cumulative EIA assessment from para. 6.11 onwards, principle and plan-led issues in paras. 10.1 and 10.21 onwards, the Case for Growth from para. 10.24 and in relation to transport and associated cumulative assessment and scenario planning from para. 15.52 onwards.
- 9.31 The full responses to the application are available to view on the Council's website.

#### Life Science Sector

- 9.32 A number of existing life science partners to the Campus have written in support of the proposal.
- 9.33 Babraham Research Campus emphasises existing working relationships of employees across the two sites and that some start-ups have emerged from either campus and relocated to the other to benefit from their specialisms (e.g. Kymab, Eagle Genomics). They emphasise a risk of not fulfilling the region's potential if the scheme is not realised.
- 9.34 Congenica explain that they are an international genomics company that is born out of the pioneering research undertaken at the Wellcome Trust Sanger Institute and by the NHS and that it is a partner in the 100,000 Genomes Project. They state that genomics as a science is in the throes of being translated from research into clinical practice with the potential for better healthcare through precision medicine, improved efficiency and affordability of health delivery. They state that the site will provide a place for the training of a new generation of skilled biodata scientists and the jobs to sustain them.
- 9.35 Present on the Campus since 1994, the EMBL-EBI state that they are the world leader in bioinformatics data resource provision and that they collaborate extensively with academics and commercial businesses. They state they have a requirement for 150 residential units and an immediate requirement for 5,000 sq.m of additional office space and they are working with public funders to secure investment for this. They state that *'having campus-linked accommodation would allow us to better support new international recruits and our hundreds of short-term visitors and collaborators'*.

- 9.36 Genomics England state they are a company set up to deliver the 100,000 Genomes Project (now complete) and that they lease a sequencing facility at the existing Campus. Their aim is to create a new genomic medicine service for the NHS, transforming the way people are cared for. They strongly support the proposal on the basis that it will enable the Campus to be the international centre of excellence in genomics and biodata.
- 9.37 Global Gene Corp write to say that they located their R&D headquarters onto the existing Campus within the Biodata Innovations Centre (BIC) building because of the unique location and access to the two existing research institutes. They state that their company will – through the development – continue to benefit from the close relationship with the institutes on site and other businesses working alongside.
- 9.38 Illumina emphasise they have contributed to and benefitted from the ecosystem around the existing Campus, including being able to attract and train the world's best scientists, transferral of talent in genomics and informatics, being co-located with start-ups and research collaborators. They have a current presence on the site and are partner in the 100,000 Genomes Project. They state this is an example of the opportunities for collaboration and success which has been created within the existing Campus environment. Illumina stress the need for required physical space on the Campus to continue its work as it could not achieve the same results if its teams were not specifically located on the Campus.
- 9.39 The London Stansted Cambridge Consortium support the continued growth of the Campus because they say it is essential for it to remain at the forefront of [genomics] and to help revolutionise healthcare. Next Gen Diagnostics and Specific Diagnostics are two companies located on the existing Campus. They emphasise the benefits they have gained from collaboration with employees at the Sanger Institute. The letter of support identifies the need for laboratory space to thrive and grow. Next Gen Diagnostics is the direct result of close and frequent informal interaction with experts on the existing site.
- 9.40 Open Targets state that they aim to change the way in which drug discovery projects are selected to improve their success rate and provide better drugs. They are founded by the EMBL-EBI and are a pre-competitive, public-private partnership. They are located on the existing Campus, employing more than 80 staff and running more than 40 projects and work with scientists from their commercial partners. They have connections with existing companies on the site including Genomics England and Eagle Genomics. They are anxious to utilise additional office and lab space on the Campus to support future expansion.
- 9.41 SciBite is a software business on the existing site. They state that they have benefitted from the co-location with the existing institutes on the site in terms of shared learning and recruitment. The facilities have enabled them to attract top talent. Sigma are similarly located on the existing Campus and state that their research and design methods are highly collaborative.
- 9.42 Connecting Science state that it is essential that *'the Wellcome Genome Campus ... should play a visible and constructive role in the public discussion and dialogue around this revolutionary science'*. They emphasise that their programme currently delivers training and learning opportunities for research and healthcare professionals across the UK, and beyond; manages a world-class events venue; supports scientists to undertake public engagement activities with schools and community groups; and researches societal attitudes to genomics in order to bring

public voices into policy and practice decisions. They state that the expansion of the Campus ‘...presents a huge opportunity to extend the reach and impact of the Connecting Science programme’.

- 9.43 Wellcome Sanger emphasise the Campus vision to be the international centre of excellence in genomics and computational biology and that the Campus is established as a critical piece of UK science infrastructure; representing the largest community of researchers focussed on Genomes and BioData, on a single campus, anywhere in the world. They state that the growth in data is exponential and in the last 12 months they have generated more petabases of DNA sequence than the last 25 years combined.
- 9.44 Wellcome Sanger assert that over the last decade the Campus eco-system has grown to include entities involved in innovation, translation, clinical application and commercial activities and that the Campus competes on a global basis for talent and translation opportunities. They emphasise that genomics is a core aspect of the Life Sciences Industrial Strategy and the near future of a genomics-enabled National Health Service. They state that the site is full and colleagues are currently in discussions with potential future occupiers for over 40,000 sq.m of the 150,000 sq.m contained in the outline planning application. These occupiers have approached the Campus directly for space because they see significant advantage in being co-located alongside the research institutes. If they cannot be accommodated on Campus the opportunities may be lost to the UK. The expansion plans are viewed by Wellcome Sanger as representing a momentous opportunity to ensure that the full scientific, health, societal and economic benefits of Genomes and BioData are realised.

#### Consultation Summary Tables

##### Parish Councils

Babraham	Objects
Duxford	Objects
Foxton and Fowlmere	No Comment
Great Abington	Objects
Great Chesterford	Objects
Great and Little Chishill	Neutral
Great Shelford	Objects
Heydon	Neutral
Hinxton	Objects
Ickleton	Objects
Linton	Neutral
Little Abington	Objects
Little Chesterford	Supports
Pampisford	Objects
Sawston	Supports
Stapleford	Objects
Thriplow	Objects
Whittlesford	Objects

##### SCDC Officer Consultation Responses

Ecology	No Objection
Environmental Health	No Objection
Communities	No Objection

Health	No Objection
Heritage	Objection
Housing	No Objection
Landscape	Objection
Trees	No Objection
Urban Design	No Objection
Sustainability	No Objection
Viability	Negative Residual LV (minus £43m)
Waste	No Objection
Water	No Objection

Cambridgeshire County Council

Transport	No Objection
Education	No Objection
Minerals and Waste	No Objection
Archaeology	No Objection
Public Rights of Way	No Objection
Local Lead Flood Authority	No Objection
Supporting New Communities	No Objection
Libraries	No Objection
Public Health	No Objection

External Consultees and Organisations

Anglian Water	No Objection
Cadent Gas	No Objection
CamCycle	Objection
Cambs Clinical Commissioning Group (NHS)	No Objection
Cambs Past, Present and Future	Objection
Env. Agency	No Objection
Essex County Council	Concern
Greater Cambridge Partnership	No Objection
Grosvenor	Objection
Highways England	Holding Objection
Historic England	No Objection
Ickleton Society	Objection
Imperial War Museum	Concern
Natural England	No Objection
North Hertfordshire District Council	No Objection
Police Architectural Liaison Officer	No Objection
Smithson Hill (AgriTech)	Concern
Sport England	No Objection
Sustrans	No Objection
Uttlesford DC	Objection
Wildlife Trust	Holding Objection

Life Science Sector

Babraham Research Campus	Support
BioMed Realty (Granta Park)	Support
Congenica	Support

EMBL-EBI	Support
Genomics England	Support
Global Gene Corp	Support
Illumina	Support
LSCC	Support
Next Gen Diagnostics	Support
Open Targets	Support
SciBite	Support
Sigma	Support
Wellcome Sanger	Support
Wellcome Connecting Science	Support

## 10.0 **Assessment**

### **Principle of Development**

- 10.1 The development is put forward within the context of an up-to-date LP that was adopted in Sept 2018 and which is compliant with the NPPF, having been found by the Inspectors as a whole to be sound.
- 10.2 Policy S/1 sets out the following vision *'South Cambridgeshire will continue to be the best place to live, work and study in the country. Our District will demonstrate impressive and sustainable economic growth. Our residents will have a superb quality of life in an exceptionally beautiful, rural and green environment'*.
- 10.3 Policy S/2 defines a number of objectives to secure the vision including objective a) *'to support economic growth by supporting South Cambridgeshire's position as a world leader in research and technology based industries, research and education, and supporting the rural economy'*.
- 10.4 Policies S/5, S/6, S/7, E/9 and E/15 of the LP (2018) are relevant in terms of setting out how the vision and objectives are to be met through the Council's spatial and employment policies.
- 10.5 Policy S/5 'Provision of New Jobs and Homes' sets out the objectively assessed needs of the District over the period 2011-2031 for 22,000 additional jobs and 19,500 new homes. The supporting text to S/5 confirms that the LP identifies a supply of land that is sufficient to provide the predicted jobs and includes sufficient surplus if the economy performs better than expected. This surplus aligns with the NPPF para. 11a) that *"plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change;"*. The plan therefore responds to the evidence of employment need with a flexible employment supply, beyond the needs identified, in order to respond to changing circumstances including the growth of sectors as they emerge. The Inspectors' reports into the Local Plans found the employment provision for growth to be sound. As submitted in evidence as part of the inquiry into the AgriTech proposal by SmithsonHill, there continues to be a plentiful and flexible supply of land available for employment uses within the District.
- 10.6 Policy S/6 sets out the spatial strategy and the sequential and spatial preference for how the need for jobs and homes is to be met. In order of preference and as far as possible, the policy states that the need is to be met on the edge of Cambridge; at new settlements; and in the rural area at Rural Centres and Minor Rural Centres, with development in rural areas being limited.

10.7 Chapter 6 of the NPPF 'Building a strong and competitive economy is relevant.

10.8 Para. 80 states:

10.9 *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.'*

10.10 Para. 81 states planning policies should:

- a) *set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- b) *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- c) *seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- d) *be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.'*

10.11 Para. 82 states:

10.12 *'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.'*

#### *Objections*

10.13 Issues of principle raised relate to the fact the scheme proposal (Expansion Land part) is on unallocated agricultural land, outside the Development Framework and neither the employment, housing nor supporting uses are supported by the Council's spatial strategies. It is argued that there is a strong policy presumption against the principle of the proposal and that any development should come forward as an allocation and considered cumulatively with other emerging allocations and major development sites.

#### *Officer Conclusions on Principle*

10.14 The Expansion Land element of the proposal (113.5 Ha of the total 127.5 Ha) is at odds with the LP spatial strategy. It is not a new or carried over major site allocation. It is located on the edge of the SCDC local authority border, in a rural

location some 9.5km from the edge of Cambridge (Tichbault Road to Addenbrookes Road as the crow flies). It is not related to a new settlement proposed under the SCLP and is not required or put forward to support the emerging NUGC. Neither is it contained within a Rural Centre or Minor Rural Centre. The Expansion Land is on agricultural land without any form of supporting allocation and its development would be contrary to the sustainable development sequence as set out by policy S/6. It would ordinarily be expected that a major development of the scale envisaged would come forward initially through a call for sites and assessed through an Issues and Options report as part of an emerging LP. Officers are of the view that if granted, the proposal would represent a significant departure from the adopted spatial strategy and would be contrary to policy S/6 in particular.

- 10.15 Policy S/7 concerns development within and outside Development Frameworks. The nearest Development Framework is that of Hinxton, which is identified as an Infill Village under policy S/11. S/7 sets out what is permissible outside of Development Frameworks which includes uses which need to be located in the countryside, such as for agriculture, horticulture, forestry and outdoor recreation or where supported by other policies in the LP (such as E/15). The Development Frameworks are defined through the adopted policies maps which form part of the SCLP (2018). The maps illustrate geographically the application of spatial policies and the justification for their location is set out in the supporting text at paras. 2.51 - 2.52 to the policy. The site is located outside any settlement boundary. Policy S/7 offers no explicit support for the Expansion Land element of the proposal in this regard.
- 10.16 Turning to the employment policies of the LP, policy E/9 'Promotion of Clusters' sets out that development proposals in suitable locations will be permitted which support the development of employment clusters, drawing on the specialisms of the Cambridge area in a range of sectors. In the view of officers, a suitable location, for the purposes of policy E/9 is a site which conforms, in locational terms, to the spatial strategy and allocations within the SCLP; on such a "suitable location" development of employment clusters will be supported. What policy E/9 cannot, and does not do, is provide for the release of sites for cluster-related development which are not allocated for development and which do not otherwise conform with the LP.
- 10.17 Whilst the nature of the work undertaken at the existing Campus, and which would be undertaken at the expanded Campus, could be considered to be a specialism of the Cambridge area, the location of the Expansion Land element of the proposal could not be considered *suitable* for the purposes of policy E/9, given the significant conflict with the spatial and other policies of the LP. The location of the Expansion Land is not supported by preceding spatial policies S/5, S/6 or S/9 and neither is it supported by E/15. Furthermore, as the employment development on the Expansion Land is not coming forward within a Development Framework or adjoining or very close to the Development Framework of Hinxton, neither policy E/12 or E/13 are engaged.
- 10.18 E/15 'Established Employment Areas' states that '*In defined Established Employment Areas, redevelopment of existing buildings and appropriate development for employment use will be permitted*'. The policy seeks to support the role and function of the employment sites identified subject to there being no negative impact on the surrounding countryside or landscape character (discussed later in the report). The existing Wellcome Trust Genome Campus including land to the south of the Campus – contained within the Campus Land -

is identified as an Established Employment Area. In terms of principle, as no housing provision is anticipated in this part of the site (Dev. Area 2), E/15 lends support to the suitability of employment uses on the Campus Land element of the proposal (10.25Ha) coming forward. This is not the case for the Expansion Land.

- 10.19 The applicant draws reference to policy E/16 'Expansion of Existing Businesses in the Countryside'. This policy sets out several criteria to be met in permitting expansion plans for existing firms in the countryside which are not listed in policy E/15. Policy E/16 does not lend any support to the proposal.
- 10.20 As such, the Expansion Land part of the proposal conflicts with spatial and employment LP policies S/5, S/6, S/7 and E/9. The Campus Land part of the proposal is supported by E/15 and by consequence S/7 (criterion 2). Supporting uses to the proposed employment and housing elements, such as the educational, retail, tourist and leisure uses are discussed separately within the assessment.

#### Review of the LP

- 10.21 Policy S/13 states that the Council will undertake an early review of the adopted LP. The applicant did not put forward the site for allocation as part of the now adopted 2018 LP process. Many consultees and third parties in response to the application suggest this should have been the case but in any event such a major proposal should only come forward following a formal allocation; the early review being the opportunity for the applicant to engage in a plan-led allocation that is not divorced from its economic and spatial planning context. The supporting text to the policy suggests that the early review is being undertaken to establish what impact the anticipated changed infrastructure, landscape and economic growth in the area might have on housing need and other aspects of spatial and transport planning. The review of the LP has now begun and is anticipated to be adopted in the summer of 2023.
- 10.22 Because this application has been made it should be determined by the Council. The applicant has the right of appeal against non-determination if the process for determination extends beyond what has been agreed. The fact that the LP review has begun is not a proper reason for not determining this application now.
- 10.23 The applicant suggests that the need for the proposal did not arise in time for the land to be considered as an allocation as part of the 2018 LP (this process began in 2011) and that there is an urgent need for the development in the national economic and health interests. The context of the urgent request for outline permission in advance of any formal allocation is set out in the Case for Growth, considered next.

#### **Case for Growth**

- 10.24 The Case for Growth (CfG) is a supporting document submitted with the application which seeks to provide an overarching justification for the delivery of the Genome Campus expansion.
- 10.25 The CfG document sets out that the existing Campus is the world's leading centre for genomics research, having played a central role in the Human Genome Project (1990-2003), which read and recorded the complete sequence of DNA in an individual for the first time and transformed the way life is studied. The

Campus has attracted some £3.2 billion in funding and has grown from 50 to 2,500 people drawn from 83 countries.

- 10.26 In the context of a full Campus with limited additional capacity, Wellcome wish to continue to thrive and put forward the application as a *'unique opportunity...in the interests of world health and of the UK economy'*. The application is also placed within the context of rapidly decreasing costs in genome mapping and an *'exponential explosion of biodata [offering] unparalleled opportunity for transformative breakthroughs in every branch of medicine and beyond'*.
- 10.27 The potential for genomics to transform the delivery of healthcare is not disputed by any third party, it is a dynamic area of science in which the UK is a world leader, but questions have been raised by consultees as to why it is necessary to expand in the location proposed as an exception to policy and why it is necessary to grant planning permission now rather than wait for the consideration of the site under the LP review.
- 10.28 The component parts to the answers to these questions and how the CfG addresses them are explored in detail below. There then follows an officer evaluation of the CfG.

#### The Role of Genomics in Delivering Government Life Sciences Policy

- 10.29 As context for its proposals, the CfG claims that genomics is and will increasingly be transformational to addressing global health and environmental challenges. It sets out that there are clear public health benefits of international importance that have resulted from the research that has taken place on Campus, including, for example, contributing significantly to mapping the first genome.
- 10.30 The CfG cites evidence demonstrating the importance that Government attaches to the life sciences sector within which genomics sits, citing the Life Sciences Industrial Strategy and Sector Deal in particular. National industrial and planning policy provides clear support for life sciences, identifying the sector in its Industrial Strategy as playing a key role in addressing the identified 'Grand Challenges'; the Industrial Strategy is explicitly referred to in the National Planning Policy Framework, which places particular emphasis on enabling economic growth in sectors *'where Britain can be a global leader in driving innovation'*. As a world leading centre for genomics, the current Wellcome Genome Campus clearly plays a key role in delivering the Government's Life Science Industrial Strategy.
- 10.31 The CfG cites evidence and government strategies which together demonstrate that the current global market opportunity of genomics is very significant, footloose and time limited. It also cites the Government's Life Sciences Sector Industrial Strategy and Sector Deal which notes that the UK is well positioned to be a global leader in genomics, building on existing scientific expertise, but notes that the UK is in danger of falling behind other global locations in terms of jobs and investment in genomics-related industry, referring to growth in jobs and government investment in competitor locations including San Diego and New England.
- 10.32 In principle, therefore, supporting the growth of the life sciences sector, and in particular genomics, is in the interests of global health and supports the UK Industrial Strategy. The case for supporting this growth through the expansion of the Wellcome Genome Campus on adjacent land is summarised below, followed by an evaluation of the arguments.

### Alternative Locations

- 10.33 To support the proposed location of development, chapter 4 of the ES accompanying the application considers four alternative scenarios:
1. No Development – outlines the consequences of no expansion of the Existing Campus and the site remaining in its current form;
  2. Redevelopment of the Existing Campus – outlines the option of the Existing Campus being redeveloped to meet the project objectives;
  3. Development of Land to the North of Hinxton (Lordship Lane Farm) – considers the feasibility of developing land north of the Existing Campus, between Hinxton and Duxford, to meet the project objectives; and
  4. Alternative Designs – presents the main alternatives considered during the design evolution process.
- 10.34 In the first alternative no-development scenario, the Campus would not be able to offer the floorspace sought for the range of businesses envisaged and the negative environmental impacts of developing – particularly the Expansion Land – would not come about. The economic benefits that the expansion is anticipated to be generated, including 4,275 jobs at the Campus, would not be realised. The potential socio-economic losses are a material consideration. The ES concludes that international competition could result in significant job creation being lost overseas in the no-development scenario.
- 10.35 In the second alternative scenario where only the redevelopment of the existing Campus is put forward, further floorspace provision is constrained by the presence of flood zones, a County Wildlife Site, the Wetland Nature Reserve and an area of significant archaeological value. The existing Campus is also partly within the Hinxton Conservation Area and setting of Hinxton Hall (Grade II\*). Wellcome argue the existing Campus only has capacity to deliver a small number of new buildings primarily within Southfield and that this could not provide the necessary floorspace for a successful expansion unless there was substantial redevelopment, necessitating replacing the existing modern buildings with larger buildings at a much higher density.
- 10.36 In the third alternative scenario development of land to the north of Hinxton (Lordship Lane Farm) has been considered. This land is within the ownership of Wellcome and is significant in size. It has the benefit of being closer to Whittlesford Parkway railway station but has the following limitations: closer proximity to Hinxton, Duxford and Whittlesford (coalescence); former gravel workings and historic landfill; flooding risks associated with the river Cam; impacts on river Cam County Wildlife Site. However, the main reason given by Wellcome for not choosing this land to develop as an alternative is that it would lead to a split campus location and would not lend itself to a collaborative work environment. That notwithstanding, land to the north of Hinxton is outside the Development Framework and its development, like the Expansion Land, would be contrary to the LP's spatial policies.
- 10.37 The fourth alternative considers different designs for the development of the Expansion Land. These are set out with the applicant's Design and Access Statement.

10.38 The ES states: *'The purpose of the Proposed Development is to expand the Existing Campus to allow it to maintain its position as a world leading cluster for genomic research. Alternative locations, other than on land to the north of Hinxtton which is owned by the Applicant, have been ruled out by the Applicant on the basis that a split location campus would not deliver the objectives of the project'*.

10.39 Some third parties suggest a genome campus elsewhere within the UK, in areas which have higher levels of unemployment, where the economic benefits would be felt more greatly. However, such alternative sites would not benefit from the very considerable investment that has already been undertaken at the existing site, its strategic location within the Cambridge cluster and the vision of Wellcome for the existing Campus *'to build on the scientific foundations of the campus to become the international centre for scientific, business, cultural and educational activities emanating from Genomes and Biodata'*. Wellcome's case for dismissing a split campus either locally or further afield relies on the co-locational benefits of the existing Campus expansion to carry weight. These perceived benefits are discussed later in the CfG assessment.

### Campus Strengths

10.40 The CfG claims that if life science growth is not secured at the Campus then it is likely that investment will be made outside of the UK. The following features of the existing Campus are used to support this claim:

1. Its unique and focused role
2. The critical mass of life science activity
3. Its international reputation
4. Clustering and co-location

10.41 Supporting information provided by the CfG for each of these features is summarised below.

#### *1: Unique, Focused Role*

10.42 The CfG and Planning Statement include the following information supporting the argument that the Campus has a unique, focused role:

- The Genome Campus is the only single-focus genomics and biodata science community in the world.
- It has two of the world's foremost genomics institutes: the Wellcome Sanger Institute which is at the forefront of genomic sequencing and research and the European Molecular Biology Laboratory's European Bioinformatics Institute (EMBL-EBI) which receives, analyses, curates and makes available biomolecular science data to the global life sciences community. Evidence cited in the CfG states that the co-location of Wellcome Trust Sanger Institute and the EMBL-EBI, represents *"a significant aggregation of genomics and bioinformatics skills within a single campus"*.

#### *2: Critical Mass of Life Science Activity*

10.43 The CfG demonstrates that the existing Campus has a critical mass of world-leading life science activity, centred upon the co-location of the Wellcome Sanger Institute and the EMBL-EBI, which together play a role as anchor research institutes, attracting further investment and research. Case studies and other evidence are used to support this claim:

- Cites the Annual Report of the Chief Medical Officer (2016) in describing the Genome Campus as an example of a *'critical mass centre'* which should be viewed as national infrastructure, explicitly identifying the co-location of the Wellcome Sanger Institute and the EMBL-EBI.
- Provides examples of a number of public and public-private partnership organisations and projects attracted to the Campus in recent years, including the 100,000 Genomes Project, ELIXIR, Open Targets and BioData Innovation Centre (BIC).
- Provides evidence of demand for additional space from genomics focussed companies. In relation to the BIC, it notes quick uptake of available space there, and that six companies housed within the BIC had further expansion plans as of November 2017.

### 3: International Reputation

10.44 Linked to the Campus' critical mass, the CfG demonstrates its international reputation, using the following examples:

- Notes that the Wellcome Sanger Institute has a global reputation as one of the five principal centres responsible for the Human Genome Project, having mapped 30% of the first human genome.
- Refers to the international profile of the businesses that the BIC has attracted
- Refers to the international nature of the Campus community, including staff across the Wellcome Sanger Institute and EMBL-EBI having citizenship in 83 different countries.
- Refers to 3,800 research and scientific papers produced in the last five years by the two institutes of Wellcome Sanger and EMBL-EBI, many of which it claims to be amongst the world's most cited.
- Evidences the large number of international links with other genomic and biodata centres of expertise, researchers and commercial organisations.

### 4: Clustering and Co-Location

10.45 The CfG notes that clustering works at different geographical levels, acknowledging that the Campus: sits within the Oxford, Cambridge, London 'Golden Triangle' of research, development and innovation; the London-Stansted-Cambridge Growth Corridor; and the Cambridge Life Science Cluster. Such local and national connections are evidenced in the CfG at its appendix 3.

10.46 The Planning Statement also claims that the existing Campus is a globally important research cluster in its own right, and the CfG claims that there is a *'unique milieu for innovation created by the mix of genomics-focused occupiers on the site'*. These occupiers house experts *'from a range of professional backgrounds and disciplines...bringing their expertise together to serve a common purpose'*. The CfG includes: cited research; a daily interaction of Wellcome Sanger Institute teams diagram; and testimonials.

10.47 By way of example and to support the CfG clustering/co-locational arguments, a letter has been received in support of the application from Illumina. Illumina's headquarters are on Granta Park, but they also occupy space on Campus in the Ogilvie building. The letter from Illumina references the 100,000 Genomes Project to which they were a partner and in relation to this they state:

- 10.48 *'Many patients with rare genetic diseases and cancer have benefited from this study. This is an example of the opportunities for collaboration and success which has been created within this Campus environment, the ultimate goal of which is to bring benefit to patients to deliver genomic medicine services to the NHS. In order to support this goal, Illumina needs to expand its facilities and team on Campus to meet demand in the next five years. It is extremely important that Illumina has the required physical space on the Campus to continue its work as it could not achieve the same results if its teams were not specifically located on the Campus being adjacent to one of the largest concentrations of genomics and biodata expertise in the world.'*
- 10.49 As summarised in appendix O, other genetic focused firms currently on the Campus have written to the Council and expressed similar views regarding the benefits of collocation and collaborative work opportunities, with particular emphasis on the proximity of the institutes EMBL-EBI and Wellcome Sanger and the need to be 'on campus'. They include letters from Genomics England, Global Gene Corp, Next Generation Diagnostics and Specific Diagnostics, Open Targets, SciBite and Sigma.
- 10.50 The CfG states the Campus *'is one of the few places in the world where biologists work alongside software developer, data miners, mathematicians, physicists, user experience designers, computational biologists and bioinformaticians; bringing their expertise together to serve a common purpose'*. Part of the success of the Campus put forward in the CfG lies in the existing Campus open science policy where all pre-competitive and non-commercial occupiers are expected to be transparent in their working methods.

#### The Proposed Uses

- 10.51 The following section summarises the justification given by the CfG for the different elements included in the application masterplan, including:
1. Research and Development Space
  2. Connecting Science
  3. Housing
- 1: Research and Development Space*
- 10.52 The CfG claims a need to provide flexible science and data floorspace for commercial companies to meet *'just in time'* requests for floorspace, thereby capturing footloose global investment. It uses the following arguments to support this claim:
- Cites Government Life Sciences Strategy which seeks to ensure that the UK capitalises on its leading role in science and translates this further into commercial investment.
  - Drawing on the support identified in Government Strategy, cites the size of the global market and states that it is essential that the UK captures an increased share.
  - Evidences demand for space, identifying total interest for around 44,000 sq.m, and states that this provides confidence that the 150,000 sq.m proposed is reasonable.
- 10.53 Letters received in support of the application provide further evidence of need for additional commercial space. In particular, the EMBL-EBI state that they immediately require a further 5,000 sq.m of additional office space to house their

growing personnel and external collaborator numbers. Illumina state that many of the existing businesses on the site will outgrow their space within two years and that the need for more commercial space is urgent. This is evidenced in the response from Next Generation Diagnostics and Specific Diagnostics, two firms which currently occupy the BIC building who state that they will need space for their companies to thrive and grow and who are eager to occupy new space in new facilities on the expanded Campus should they become available.

- 10.54 The CfG puts the opportunity into context citing the Government's Life Science Competitiveness Indicator (Office for Life Sciences 2016) with the UK securing a declining share in Initial Public Offerings (the first sale of stock, indicating the start up of new businesses). By way of example in terms of demand, the existing BioData Innovation Centre (BIC), which is full with 9 companies, has attracted interest from 34 companies since opening in 2016. Two of the companies within BIC require additional space now and four companies are on a waiting list for when space becomes available.

## *2: Connecting Science*

- 10.55 The proposal seeks to expand upon the Campus' existing Connecting Science programme which is based within Hinxton Hall and associated buildings and provides a range of meetings rooms, a lecture theatre, accommodation and dining facilities. The CfG sets out that the Connecting Science programme provides; post-graduate courses and conferences focussed on biomedicine; funds, develops and delivers training and conferences; and offers retreats for high-level scientific discussion. In 2016 it hosted 387 events and runs public engagement activities which reach over 10,000 people annually, including around 1,000 young people visiting the Campus annually. The programme aims to enable everyone to explore genomic science and its impact on research, health and society.
- 10.56 The CfG sets out that a new facility could include interactive exhibitions, tell the story of DNA, include a 'Gene Kitchen' allowing people to explore their own DNA and provide additional education and study space.
- 10.57 Wellcome Genome Campus Connecting Science has written to the Council in support of the application. Their letter sets out that it is essential that Connecting Science plays a visible and constructive role in the public discussion and dialogue around genomics. The letter states:
- 10.58 *'Our mission is to enable everyone to explore genomic science and its impact on research, health and society. We connect researchers, health professionals and the wider public, to spark new conversations and support learning by drawing on the ground-breaking research taking place on the Wellcome Genome Campus.*
- 10.59 *Our programme currently delivers training and learning opportunities for research and healthcare professionals across the UK, and beyond; manages a world-class events venue; supports scientists to undertake public engagement activities with schools and community groups; and researches societal attitudes to genomics in order to bring public voices into policy and practice decisions.*
- 10.60 *The expansion of the Wellcome Genome Campus presents a huge opportunity to extend the reach and impact of the Connecting Science programme. Our events are consistently oversubscribed, indicating the strong demand for our cutting-edge topics. As genomics becomes embedded within healthcare provision in the*

*UK, via the NHS, the need for a workforce with the appropriate skills and training in this area will only increase.*

- 10.61 *The Campus expansion offers the potential to substantially increase our training offer, reaching many more research and health professionals than is currently possible, in areas such as genetic counselling, biodata analysis, and informatics.*
- 10.62 *The masterplan would also bring the opportunity to increase our work inspiring the next generation of genome scientists, by expanding our schools programme with bespoke spaces and facilities. We already host visits to the Campus from key stakeholders such as school, community and patient groups, but are completely at capacity. An expanded site would allow us to increase the scale of this activity, opening up this most personal of sciences to the world, and playing a part in developing the biologists and computer scientists of tomorrow...'*
- 10.63 The argument is that if the vision behind the application '*to build on the scientific foundations of the campus to become the international centre for scientific, business, cultural and educational activities emanating from Genomes and Biodata*' is to be realised, the educational and cultural opportunities associated with the expansion of the Connecting Science programme present a key element of this. The application envisages a need for a facility of 5,000 sq.m to allow for the Connecting Science programme to expand. The application also allows for space for a Technical Educational Facility should there prove demand to train data scientists of the future and encourage the take-up of STEM subjects at A-level/NVQ for young people of sixth form age.

### *3: Housing*

- 10.64 The CfG and Housing Statement claim that housing, and a wider lifestyle offer including cultural, sport and recreation provision is essential to ensure the continued attractiveness of the Campus to current staff and to top scientists from around the world, thereby ensuring its continued role as an international leader in genomics.
- 10.65 Arguments used to support this include:
- Identifies local housing availability and affordability challenges as a particular reason to provide housing on site, citing Campus surveys and focus group sessions which identified that availability of housing as a consistent concern, and that 33% of respondents would like to live on Campus.
  - Notes that the local housing market is difficult to access for those coming from overseas, both for those who seek to live in the area for the short and longer term.
  - Cites research stating that one of the wider conditions needed to support innovation is a 'total place agenda' including an affordable housing component, which promotes vibrancy, quality of life for residents, reduces through traffic, and encourages economic integration.
  - The application claims that the provision of housing will result in more sustainable travel patterns of those working on site.
  - All homes will be subject to restrictions ensuring occupation by Campus Related Workers.
- 10.66 In their response to the application, the EMBL-EBI has stated that they would '*quickly occupy and maintain rolling tenancies for a 150 of the planned accommodation units*'. Whereas Illumina state '*As the cost of housing in the*

*local area can be challenging, the provision of new amenities, including housing for Campus-linked workers, will be beneficial in helping to create a Campus that can attract and retain talent'. The prospect of housing for staff is also supported by Next Generation Diagnostics and Specific Diagnostics in their response to the application in order to reduce commute times for employees.*

#### Claimed Economic Benefits

- 10.67 Drawing on the above evidence of the strengths of the existing Campus and the above elements of the proposed expansion, the ES claims that the expansion would support '*a scaling up of opportunities in all areas of the Wellcome Genome Campus' existing work... for both the Campus and at wider spatial scales – up to internationally'*, including the following qualitative and quantitative benefits:
- Increased opportunities for formal research and formal and informal collaboration; increased education and outreach links through the Wellcome Genome Campus' *Connecting Science* programme; increased in-work training opportunities, growth in the concentration of genomics and biodata skills on Campus and overall skills profile within the broader life sciences cluster; increased supply chain benefits; and growth in Cambridge profile as a location of global standing in biodata and genomics research.
  - At a site level, the development would be expected to generate 4,275 net additional jobs. At the District level it would generate between 8,750 and 9,225 net additional jobs, and at the national level up to 11,190 and 11,790 net additional jobs.

#### Officer Evaluation of CfG Arguments

##### *District-Wide Context*

- 10.68 In considering the need for expansion of the Genome Campus proposed in the CfG it is important to consider the District wide situation.
- 10.69 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 LP period for both Districts. It also analysed the qualitative needs for new employment development over the LP 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 the NPPG regarding employment needs and land supply.
- 10.70 The LP 2018 responded to the evidence of need with a flexible employment supply, beyond the level of need identified, in order to provide a flexible plan that can respond to changing circumstances including the growth of new sectors as they emerge. That flexibility is defined and secured by policies in the LP. The LP 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 LP period 2011-2031.
- 10.71 Considering land supply overall at the District level there is a sufficient and flexible supply of employment land to meet and exceed 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. In purely quantitative terms there is no need for the floorspace proposed. The CfG must be considered in this context.

*Why this Site?*

- 10.72 Officers are of the view that there are no viable or credible alternatives that could be realistically explored by Wellcome if they are to realise their vision. The no-development scenario would result in potential harm to the economy. The existing Campus is constrained, has limited space for expansion and it is not viable for it to be subject to a wholesale redevelopment at higher density because it would involve the removal of fully occupied modern buildings and their replacement with taller buildings that would likely give rise to significant heritage and landscape issues. Developing on land to the north of Hinxton would split the Campus and, whilst closer to Whittlesford Station, is also subject to land use and planning policy constraints. Developing an additional or partner campus elsewhere in the UK would not have the benefits that the existing Cambridge cluster brings.
- 10.73 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. In general, it is considered incorrect to assume that clustering benefits can only be obtained from locating a sector or specialism on a single site and this formed part of the Council's argument for resisting the AgriTech proposal on the adjacent site.
- 10.74 As part of a public meeting on 31 May 2019, members of the Planning Committee were invited to a briefing from Wellcome and its partners on the CfG. The CfG sets out that '*Genomics is the study of genes and their functions, exploring how living organisms develop, specialise, mutate and sustain life and how their DNA supports this*'. The CfG is put forward for a very particular life science sector within which the existing campus already specialises and excels, with the support of two world renowned research institutes, the Wellcome Sanger and the European Molecular Biology Laboratory's European Bioinformatics Institute (EMBL-EBI).
- 10.75 The highly specialist nature of the work undertaken at the Campus, its existing successful establishment, the anchored institutional research base and the evidence of future demand for significant floorspace combine to represent a set of material considerations which can be weighed in favour of the proposal. The context within which the application comes forward therefore significantly contrasts with the wholly speculative, wide breadth and loosely defined application for the AgriTech park as put forward by SmithsonHill at the recent inquiry. The Council's closings for the AgriTech inquiry included a submission that there was no evidence of occupier demand for space on the site, no anchor tenant proposed, no need demonstrated for co-location on a single site, no applicant experience in the field of AgriTech and no clear vision for what type of AgriTech floorspace would come forward. The Council argued the appellant's claimed benefits were seriously undermined by these factors. The same considerations do not arise in respect of the Wellcome proposal.
- 10.76 Most recently, in an article of 11 Sept 2019, the BBC reported the '*World's largest genetics project to tackle deadly diseases launches*', stating:
- 10.77 '*The £200 million whole genome sequencing project is being created, forming a partnership of pharmaceutical firms and health experts which will examine and*

*sequence the genetic code of 500,000 volunteers at the UK Biobank, based in Stockport... The new project aims to improve health through genetic research, improve the prevention, diagnosis and treatment of a wide range of serious and life-threatening illnesses including cancer, heart diseases, diabetes, arthritis and dementia... Much of the sequencing will be by experts at the Wellcome Sanger Institute, based in Cambridge, and the results will help the NHS treat patients better. Through the Biobank research, industry can work with experts to create new treatments and preventative measures which will help those suffering from illnesses and may eventually reveal why some people develop diseases and others do not. Funding for the genome project comes from a consortium formed by the government's research and innovation agency, UK Research and Innovation (UKRI) with £50 million through the Industrial Strategy Challenge Fund, £50 million from the research organisation, Wellcome...'*

- 10.78 In this case, linked to and supporting the existing Campus' unique focus, critical mass and resulting international reputation discussed above, the evidence provided of the benefits here of co-location and the extent of collaboration on one site is convincing. The fact that genomics organisations with headquarters elsewhere also have a presence on Campus - the BIC houses satellite teams from Genomics England, Illumina and Sigma Consulting Solutions - demonstrates that these organisations see clear benefits to co-locating with other life science organisations at the Campus.
- 10.79 Drawing on the above, while assessments of additionality of employment are intrinsically uncertain, the existing global reputation of the Campus, together with the clear evidence provided of demand for additional space, suggest that the estimated economic benefits of this proposal identified above are credible and should be given weight. Providing additional space for Campus existing activities could be expected to further increase the existing critical mass of scientific activity, increasing the number of collaborations enabled by co-location on one site. The existing critical mass and co-location benefits on the Campus are clearly location specific. As a result, the assessed quantum of global scientific and local and national economic benefits of this proposal would be unlikely to arise elsewhere in the UK to the same level and there is a risk that the economic benefits of the proposal could be lost overseas if not realised on this site.

#### *Need for Commercial Space*

- 10.80 The provision of flexible commercial space could be expected to enhance the attractiveness of the expanded Campus to large scale companies but it will also provide further start-up and grow-on space for genomics/bioinformatics companies and space for existing or new research institutes to expand. There is evidence of demand from these sectors, with the CfG stating that there is an existing interest amounting to 44,000 sq.m of the 150,000 sq.m applied for.
- 10.81 In contrast to the AgriTech appeal, the application is far from speculative and has substantial existing demands for additional floorspace which cannot currently be met. For example the BIC, which hosts nine partner companies, is full and some of those companies - which are direct spin-outs from the institutes - have indicated their wish to expand onto the enlarged Campus because of the co-locational benefits it offers. Whilst there would be capacity for individual firms, such as Next Generation Diagnostics and Specific Diagnostics who are in BIC currently, to locate to other employment sites in the District, the CfG makes a compelling argument that it is the unique nature of the Campus that will retain these sorts of companies whilst also drawing in companies of national and international importance to support the Government's ambition to translate UK

research into commercial activity. It is accepted that the existing open science policy – which encourages collaboration - does not easily align with larger established firms' commercial interests but this is not to say that such firms, like Illumina, would not continue to have a presence on site or not participate in collaborative projects working with non-commercial research partners such as Genomics England and the NHS into the future. The CfG states that there is a growing trend of commercial entities engaging in pre-competitive collaborations both within academic R&D and with other commercial entities.

- 10.82 The ambition shown by Wellcome, which seeks to grow the existing ecosystem, clearly aligns with the aims of the Life Science Industrial Strategy. Whilst third-party objectors have raised concerns regarding increased commercialisation of the Campus and a change in its nature, there are compelling reasons as set out as to why it should be allowed to evolve and to seize the huge growth opportunity now available to it. The commercial space would be subject to a planning condition restricting the specialist nature of the work undertaken by companies locating there. Given the unique nature of the proposal and the location, this approach is both reasonable and necessary. The commercial element of the proposal is acceptable due to the global scientific and local, regional and national economic benefits that would arise.

#### *Connecting Science*

- 10.83 The vision for the expanded Campus includes becoming the international centre for cultural and educational activities emanating from genomes and biodata. At any one time, the CfG estimates that the Campus hosts 500 visiting scientists and researchers. It is clear that the expanded Campus would not simply be a business park but would offer educational support and training and help disseminate the importance of genomics work to society at large. This ambition is reflected in the response from Connecting Science to the application. The Connecting Science programme is central to the vision for the application and is a key element in the CfG in promoting public awareness of and engagement in genomics. It would bring clear educational opportunities to those accessing the programme, including for local schools to promote the study of STEM subjects, foster links to help provide the potential for a UTC specialising in data science and would help train scientists of the future from the UK and abroad. The future plans outlined by Connecting Science clearly aligns with the Life Sciences Industrial Strategy which confirms that access to highly skilled scientists is one of the most important features of a successful basic science base in the UK.

#### *Housing*

- 10.84 The Housing Statement sets out that the 1,500 homes proposed represents a meaningful quantum, supported by evidence of existing latent demand and anticipated future demand created by the proposed employment expansion. As such, the CfG argues that the proposed quantum of housing would effectively form a reasonable contribution to addressing the specific housing needs of Campus workers, rather than attempting to meet general market need.
- 10.85 The evidence and arguments cited above relating to housing are not disputed: evidence cited in the CfG demonstrates a) the importance of attracting and retaining talented scientists from around the world; and b) that other international competitor locations are providing housing close to workplaces to maintain their attractiveness for scientists.

- 10.86 In principle, the provision of housing could therefore be expected to enhance the attractiveness of the expanded Campus to employers and scientists. On the basis that the proposal is acceptable due to its global scientific and local, regional and national economic benefits, inclusion of the housing proposal could be expected to maximise those benefits.
- 10.87 As a separate point, the argument that provision of housing on site would reduce the transport impacts of this proposal is not disputed. However, this justification is considered secondary to the economic case for housing discussed above and would not on its own merit locating housing in the open countryside in conflict with the Local Plan.
- 10.88 Beyond justification for the principle of housing at this site discussed above, the detail of the housing offer including tenures and types is explored elsewhere in this assessment from para. 11.00.

#### *Justification for the Timing*

- 10.89 A speculative development of the scale proposed has a theoretical potential to absorb employment capacity for future growth as envisaged in the LP. However, the nature of the floorspace proposed is to be conditioned for the specific research and translation needs of the genomic and bioinformatics sector and officers do not consider that a District wide employment land take-up would be prejudiced. Neither do officers consider that the application gives rise to a prematurity issue in the sense identified by the NPPF, which advises that refusal on these grounds will seldom be justified where a draft plan has yet to be submitted for examination.
- 10.90 It is a material consideration as to whether the development of the site would prejudice strategic issues that need to be considered through the LP review or prejudice other emerging LP allocations, such as NUGC. On this latter point, whilst Uttlesford DC has lodged a formal objection, no specific evidence is put forward which demonstrates that the proper planning of NUGC would be prejudiced. NUGC is across the A11 and whilst it is for that emerging proposal to justify its inclusion as part of the UDC LP, Wellcome are agreeable to allowing potential links across the A11 to Tichbaulk Road for pedestrians and cyclists should any permission for NUGC be forthcoming. The proposed expansion of the Campus is not dependent on NUGC coming forward but is suitably flexible in how it might allow better connections to be made.
- 10.91 It is clear that granting planning permission for this proposal would have an impact in the consideration of strategic sites and issues in this part of the District and beyond through a LP review. Notwithstanding the outcome of the appeal for AgriTech, such strategic sites across the area could include AgriTech, NUGC, the former Spicer's site for Huawei, Gonville and Caius aeropark plans, and any plans for Duxford IWM. Strategic issues include, but are not limited to, the A505 study commissioned by the Combined Authority and GCP plans for Whittlesford Parkway and the South East Transport Study for the A1307, the latter two projects of which are contained within the proposed S106 HoT's for proposed proportional contributions.
- 10.92 However, officers are of the view that the local, regional and national economic and global scientific benefits - as discussed above - are considered to outweigh the benefits of delay and consideration of the site as part of the LP review. In any event, the application has been submitted and needs to be determined. In addition, given that growth at this location is important to the delivery of the

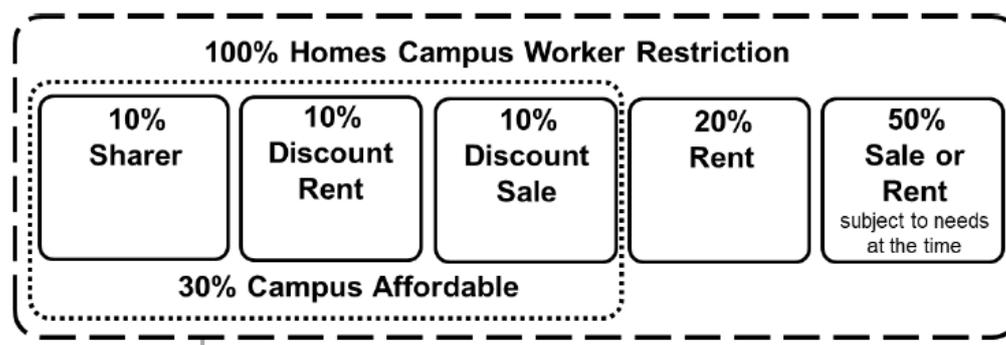
Government's Life Science Strategy and Industrial Strategy, the competitive nature of the global genomics market and the linked risk that investment may be lost to other global locations - supported by clear evidence of immediate demand – are factors are considered to be particularly significant arguments that justify the urgency of the proposal.

## 11.0 Housing

### Overview

- 11.1 The housing is not put forward to meet general market or affordable housing needs. As set out in the CfG, the inclusion of housing as part of the proposal is seen as essential to help attract and retain talent, to strengthen the international competitiveness of the Campus and to enrich the sense of place as a living and working science community. A secondary effect of the housing would be to internalise a substantial number of trips within the site. The nature of the housing put forward is a key material consideration in relation to policies H/10 'Affordable Housing' and policy H/9 'Housing Mix'.
- 11.2 The housing offer put forward by Wellcome was revised in August 2019. Its main component parts are as follows:
- Up to 1,500 new homes of tenure and type to support and enable growth of the Wellcome Genome Campus;
  - 100% of homes restricted to Campus Related Workers;
  - 30% Campus 'affordable' homes; and
  - At least 40% of homes for rent

The housing offer is summarised in the following diagram:



- 11.3 Wellcome's housing commitments are to be secured through a S106 agreement and conditions. These will allow on-going monitoring of need and review of provision on a regular basis to ensure that the homes meet Campus demands. The following sections of the housing chapter detail the key elements of the housing offer, but first it is necessary to understand how the housing is proposed to be defined as the scheme would progress from outline to reserved matters stages.

### Defining the Housing

- 11.4 Following the grant of any outline planning permission (via conditions and S106 obligations), Development Area Briefs (DAB's) would be prepared for Dev. Areas

1 and 3. Dev. Area 2 on the existing Campus is not proposed for housing. The DAB's would be submitted to the Council for approval and would provide the framework within which subsequent RM applications would be prepared. A DAB would, amongst other things, set out the expected mix and tenure of homes to be provided for its area, including for specialist, accessible and custom-build needs. It would be informed by a supporting Housing Statement and a Housing Waiting List managed by Wellcome.

- 11.5 RM applications would then define the precise housing mix, informed by any relevant updates to a Housing Waiting list that may have taken place since the approval of a DAB. A RM Housing Report would be prepared alongside each RM that includes housing and would set out the justification for the type and tenures proposed.
- 11.6 The section 106 HoT's include a population monitoring and review provision and annual housing monitoring reports. This would allow a wide spectrum of information regarding the housing (consented / constructed / occupied / sold / rented / household income profile etc) to be analysed and fed into the DAB's and subsequent RM applications.

### Quantum

- 11.7 As set out in the SCI, Wellcome has twice surveyed the existing Campus community to help understand the potential demand for housing and has facilitated structured focus groups which have explored employees needs in more detail. To those taking part in the first survey, the results yielded a positive 33% 'yes' to living on Campus, 22% 'not sure' and 45% 'no'. A further survey was carried out and produced similar results.
- 11.8 The SCI states that:
- 11.9 *'A strong theme to emerge from those who said 'no' and 'not sure' was that there would need to be improvements to both the amenities and connections available to create a community they would consider moving to'.*
- 11.10 Some third-party objectors have expressed concern that the evidential base for the quantum of housing is insufficient and that the specificity of the housing offer needs to be more clearly set out. 70% of employees are aged under 45 and it is these individuals for whom Wellcome state that the local market does not meet their needs. Third parties have expressed the view that the age profile of the Campus will mean that employees will typically wish to live in Cambridge which provides a greater range of amenities than on an isolated rural site. However, there is direct evidence of demand for housing on Campus from existing employers, including from the EMBL-EBI, who indicates that it would occupy and maintain rolling tenancies of at least 150 of the planned accommodation units.
- 11.11 With an increase in Campus employees from 2,500 to an estimated 6,800, the provision of 1,500 housing units could accommodate approximately 22% of all employees. Officers are of the view that the quantum of provision is appropriate in relation to the outcome of the Campus surveys and necessarily so given the unique nature of the proposal. Further surveys could be undertaken, however, Wellcome are not able to be more specific at the outline stage in terms of unit types, their distribution or cost. Whether employees are attracted to live on the expanded Campus will also depend on the quality of the place that is created, the range of community infrastructure and the flexibility to easily travel off-site as part of the Sustainable Transport Strategy. Wellcome's plans for these three elements

are ambitious and are to be secured as part of the proposed planning conditions and the S106.

- 11.12 A good number of employees may choose to live off-site, but this is not to say that the quantum of housing proposed is unrealistic. Many employees living off-site currently are based in Cambridge, but the provision of homes on Campus would offer greater choice given there is limited local availability of housing. The S106 HoT's requires a phased cap on the occupation of employment floor space as measured against a minimum resident population. This will ensure that the benefits of the internalisation of trips is largely secured and affirms Wellcome's commitments to providing a living/working science community.

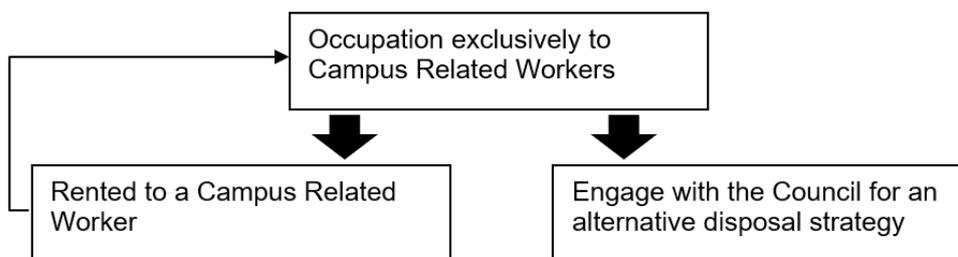
#### Campus Related Workers

- 11.13 The proposed housing is to support the anticipated specific needs of the expanded Campus to help attract and retain talent and to compete internationally. The housing is not put forward to meet general market or affordable housing needs. Given that the housing would be contrary to adopted spatial policies and is put forward by Wellcome as necessary to support the CfG, it follows that the subsequent occupation of the housing must be tied to employees working on the expanded Campus as otherwise the CfG arguments are diminished.
- 11.14 To this extent, all homes are proposed to be retained for occupation by what are termed 'Campus Related Workers'. This would be secured through the S106 agreement. A Sales and Lettings Policy in the S106 would detail how tied occupation would be secured and managed.
- 11.15 The applicant has submitted a Housing Statement which seeks to define a Campus Related Worker as:
- 11.16 *'any person employed by a Campus Occupier, or a person employed to provide specific services on or to the Campus, including both permanent and part time staff, those on fixed term contracts and sub-contractors. Except for Campus Affordable Homes, sales and letting will be on a first come first served basis'*.

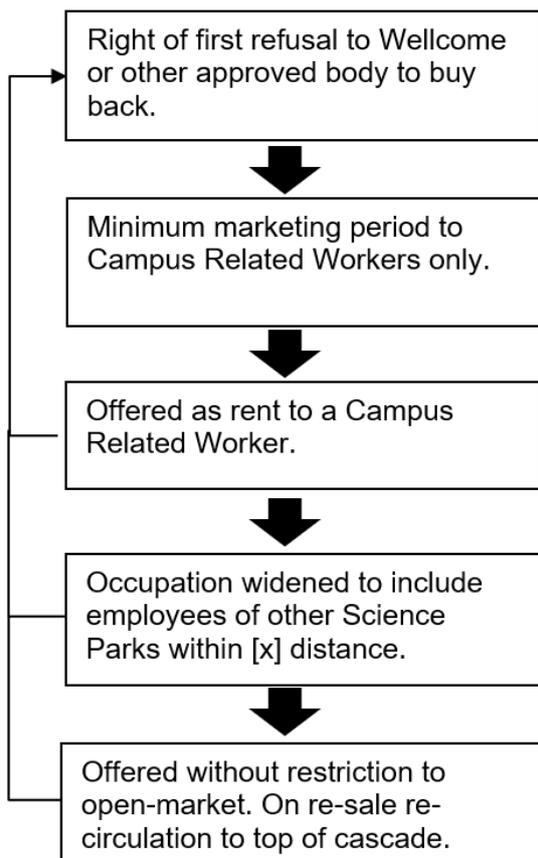
#### Draft Sales and Lettings Policy

- 11.17 Wellcome has submitted a draft Sales and Lettings Policy to inform the S106 drafting process. This would secure first sales, re-sales, first lettings and re-lets linked to Campus Related workers via a cascade mechanism. The proposed cascade can be summarised as follows:

#### **First Sale**



## Re-Sales



- 11.18 The applicant advises the approach to the cascade has been taken intentionally because lenders would not provide mortgages on the homes if there was not a cascade out of the tied occupation. On re-lets, a similar cascade approach would be taken.
- 11.19 Wellcome state that the draft Sales and Letting Policy has drawn on the principles established for affordable housing products including shared ownership and new housing products such as Pocket Living. The approach taken would ensure the restrictions to Campus Related Workers is reapplied once the units are re-sold, which is over and above what is required of intermediate products. This would be secured in the S106.

### *Objections*

- 11.20 Objections to the concept of tied accommodation have been raised by third parties, including that it is a 'feudal' concept, outdated and unworkable with potentially controversial implications for occupants. However, occupancy restrictions are not unusual to the planning system. Pocket Living, which operates in London, is one such example where local first-time buyers are prioritised for discounted market housing.
- 11.21 There are also many examples of agricultural workers' dwellings being subject to occupancy controls set through planning conditions/S106. As set out above, for the properties to support the CfG, they must be occupied by Campus Related Workers. Some third parties have suggested that if there is to be a Campus Related Worker restriction that it should not allow any flexibility outside of this and that workers should be given 12 months to vacate and sell but only to other

Campus Related Workers. Reference is made by third parties to accommodation provided by Stanford University, California, which ties accommodation in this way, however officers note that the Stanford website for 'New Home Owners' currently states:

- 11.22 **'Important Note:** In the current lending environment, some lenders are finding it difficult to lend on campus properties. If your property is leased, you are advised to discuss this with your lender prior to spending time and money securing financing. **Wells Fargo** has notified Stanford that at this time, it is not able to offer loans on Stanford leasehold properties or in conjunction with shared appreciation loans from Stanford.' (<https://fsh.stanford.edu/homebuyers/index.shtm>)
- 11.23 Whilst this is a different lending market, it demonstrates the potential issues purchasers may face if there is not a cascade out. As a result of the proposed cascade, third parties have also raised the issue of incremental and significant creep away from tied occupation which would not serve the CfG and which undermines the evidence of demand for housing in the first place. However, the need for a cascade out of tied accommodation does not flow from a perceived lack of demand for the housing from Wellcome, it is a practical consideration. It would not be in the interests for Wellcome for there to be a significant re-sale of homes to the open market given their purpose; this would weaken the competitiveness of the site.

#### *Summary*

- 11.24 The proposed cascade provides a managed framework, which whilst not eliminating the risk of the homes not serving their intended purpose, seeks to minimise that risk in an appropriate manner. Any S106 could build in a trigger for a review mechanism for the Sales and Lettings Policy which would allow the Council and Wellcome to alter/refine its provisions should the homes not be meeting the needs of the Campus. Officers are of the view that the proposed cascade provides a sound basis upon which to commence detailed drafting of the S106.

#### Campus Affordable Homes

- 11.25 Local Plan Policy H/10 requires 40% affordable homes on development sites of 11 dwellings or more except where it can be demonstrated unviable in light of changing market conditions, individual site circumstances and development costs. In which case a revised mix of affordable house types and tenures and then a lower level of affordable housing provision may be negotiated. The NPPF paras 56 – 64 and Annex 2 Glossary are relevant.
- 11.26 As set out as part of the CfG, the housing is not being put forward to meet the general market housing needs of the District nor to cater for its affordable housing needs. A traditional market led housing scheme subsidising an affordable component is not compatible with the vision for the Campus and would not meet its needs. The viability of the scheme as proposed has been assessed by the Council's viability consultant BPS in their report which is summarised in the viability section of the officer report from para 11.45 below.
- 11.27 Officers have sought to ensure the proposed housing will meet the needs of all workers on the Campus, irrespective of salary, permanence or specific role. This is to achieve a mixed and balanced community and to ensure supporting staff, such as lab technicians, teachers, catering staff, PHD students and post-doc researchers, have sufficient opportunity - due to the high costs of housing and its

limited availability locally - to access residential homes. In this respect, members will note that the definition of a Campus Related Worker includes both permanent and part time staff, those on fixed term contracts and sub-contractors.

- 11.28 The proposed affordable mix is informed by both the profile of incomes of existing Campus workers and the housing requirements of these workers which is set out in the SCI. Through surveys of existing Campus staff and analysis of income data the broad split shows a third of households earn less than £40,000, a third earn between £40-60,000 and a third earn £60,000 or more
- 11.29 Following negotiations and consideration of third-party objections, the housing offer was strengthened as part of the August 2019 submission to comprise 30% of homes (450 of the 1,500 homes), as Campus 'affordable'. This comprises:
- 10% of homes to be provided as Sharer Accommodation i.e. 2 bedroom or larger units let on individual tenancies specially designed with shared amenity space where rents are capped to be affordable to individuals earning up to £25,000.
  - 10% of homes to be provided at a minimum 30% discount to market rents with the Sales and Lettings Policy prioritising lettings of these homes to households earning less than £40,000.
  - 10% of homes to be provided at a minimum 25% discount to market sale with the Sales and Lettings Policy prioritising sales of these homes to households earning less than £60,000.
- 11.30 The affordable housing offer from Wellcome is supplemented with a commitment to regular review to ensure the housing continues to best meet workers' housing requirements (this does not extend to a viability review). The offer is supported by the Head of Housing and officers are of the view that, if the CfG is acceptable in principle, it follows that the housing offer including its affordable component has to be bespoke to the needs of the Campus rather than meeting the District's needs. Given the extent of deficit as shown within the viability appraisal, the housing offer is more than reasonable as a response to meeting the needs of a wide range of Campus workers from different household income brackets. A traditional model of general market housing subsidising affordable provision is not appropriate for the nature of the application. The CfG together with viability evidence jointly justify an alternative approach from the terms of policy H/10.

#### Housing Typologies

- 11.31 The specific characteristics of Campus Related Workers and their housing requirements have been considered by the applicant. Three broad types of housing are envisaged:
- Landing Pad: Housing for new recruits, particularly from overseas, and from elsewhere in the country. Likely short-term rental tenure, furnished homes and provision for sharers, such as in HMO style accommodation.
  - Flexible Rental: Good quality, well maintained rental homes provided on terms that allow relatively easy in/easy out along with longer rental terms and options including furnishing packages.
  - Homeowners: A range of sizes and types of homes for Campus Related Workers wishing to live on the site, including discount sale.
- 11.32 The type of housing to come forward will be set out in subsequent DAB's and RM's.

## Sale and Rent

- 11.33 Wellcome set out that the local availability of rental homes is evidenced to be sparse and will be a concern for employers who will need confidence that potential staff will be able to find and afford appropriate rental homes local to the Campus. It is stated that local agents have noted specific requirements from renters aged 35 or less who are employed on 1 – 2 year contracts requiring flexible tenancies. A minimum of 40% of homes (600 of the 1,500 homes) are proposed to be provided as rent tenure comprising Sharer Accommodation and Discount Market Rent as well as traditional Build to Rent. Wellcome confirm there is flexibility for more rent tenure to be provided subject to the ongoing review of needs.
- 11.34 The commitment to properties for sale, only extends as far as 10% of homes to be provided at a minimum 25% discount to market with the Sales and Lettings Policy prioritising sales of these homes to households earning less than £60,000.
- 11.35 In view of the bespoke nature of the housing offer, officers are of the view that the proposed minimum commitment of sale and rental properties is appropriate.

## Mix, Specialist Housing and Space Standards

- 11.36 Policy H/9 'Housing Mix' requires a wide choice, type and mix of housing to be provided to meet the needs of different groups in the community. For market housing H/9 gives a target of at least 30% 1 or 2-bedroom homes, at least 30% 3-bedroom homes, and at least 30% 4-bedroom homes, with a 10% flexibility allowance. H/9 states the mix of affordable homes is to be set by local housing needs evidence. The NPPF para. 61 is relevant.
- 11.37 As the application is neither for market nor affordable housing to meet District housing needs, an alternative banding for the proposed mix of housing is proposed as follows:

Type	No. of Bedrooms					
	Studio	1	2	3	4	Total
<i>Proposed unit size mix</i>	0-15%	10-35%	20-60%	10-45%	1-20%	100%
<i>Homes</i>	0-225	150-525	300-900	150-675	0-300	Up to 1,500

- 11.38 The proposed mix has wide bands which allows the development to be flexible and respond to demand as it emerges. The mix will be identified as part of the DAB's and in response to the Housing Waiting List. RM's will be required to demonstrate that what is proposed meets demand. Officers consider the approach to be acceptable.
- 11.39 A condition is proposed which requires not less than 10% of the housing to be designed and constructed as Building Control, Category 3, wheelchair adaptable housing. This will ensure criterion 4 of policy H/9 is met.
- 11.40 It is unlikely given the nature of the site that there will be significant demand for self/custom-build and this would not be possible in the case of mixed-use

development parcels coming forward or in apartment blocks in higher density areas. As the housing is to be built for Campus Related Workers, it is also unlikely that there will be demand for accommodation for the elderly. Nonetheless, DAB's would identify the need for self and custom build plots and specialist accommodation. The need would be identified through the management of the Housing Waiting List and reflected in RM's applications.

- 11.41 A proposed condition would ensure that all residential units meet the Government's Technical Housing Standards – National Space Standard (2015) or successor as required by policy H/12.

#### Density

- 11.42 Policy H/8 requires housing density in new settlements to achieve a housing density of 40 dwellings per hectare (dph) and in Rural Centres, Minor Rural Centre villages and Group Villages to achieve a density of 30dph. The policy states that density may vary where justified by the character of the locality, the scale of the development, or other local circumstances.
- 11.43 The application does not seek to set a housing density. Officers consider that any such target would be inappropriate because of the mixed-use nature of the proposal and the fact that land uses are not proposed to be zoned as part of the outline consent. Design Guides are to be prepared which would, amongst other matters, identify the character, mix of uses, heights and density established through the parameter plans. The approach is entirely reasonable given the unique nature of the proposal. RM applications would have to demonstrate compliance with the Design Guide(s) and members would have the opportunity to review issues such as design and density as part of the DAB and RM's process.

#### Conclusion

- 11.44 The housing offer is unique to the nature of the application and is proposed to meet the needs of existing and future Campus workers and to support the growth of the Campus. Officers consider the quantum of housing is justified. The housing can be safeguarded for workers on the Campus and the draft Sales and Lettings Policy provides an appropriate framework for how the occupation of the housing could be managed. The Campus 'affordable' housing would prioritise people from lower household incomes to access the discounted rental and for sale properties. The Campus affordable housing offer is justified given the conclusions of the Council's independent viability assessor BPS. The mix of rental and for sale properties, mix of bedroom sizes and space standards, the specific types of housing and the density would be secured by condition and/or considered in the DAB's, Design Guides and subsequent RM's. The housing provision would be monitored and reviewed to inform phases of the development and a Housing Waiting list would be established. The suite of policies H/8, H/9, H/10 and H/12 are applicable and the proposal has either demonstrated compliance with these, or with justification, departure from their terms because of the specific nature and purpose of the housing being promoted. The housing offer is acceptable.

#### **Viability**

- 11.45 The applicant has submitted a Viability Statement in August 2019. It is put forward to demonstrate why a 40% level of affordable housing cannot be delivered as per LP policy H/10. Criteria 2(d) of H/10 provides that a lower level of affordable housing provision including a revised mix of affordable house type and tenure may be negotiated where it can be demonstrated that the level of

affordable housing sought would make a development unviable in light of changing market conditions, individual site circumstances and development costs.

11.46 The NPPF at para. 57 states:

11.47 *'It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force.'*

11.48 The NPPG at paras 7-21 (9 May 2019) provides further detailed guidance on how viability appraisals should be prepared, recommending the use of standardised inputs and market evidence. It advises on how to establish Gross Development Value (GDV) and what the inputs to the costs of development should comprise including: development and infrastructure; S106; finance; professional fees and contingency fees. The NPPG at para. 13 advises land value is to be defined using 'Existing Use Value' (EUV) which is to include a premium for the landowner, referred to as EUV+. The NPPG advises that the premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land.

11.49 The applicant's Viability Statement follows NPPF and NPPG guidance. It is accompanied by a series of appendices from the applicant's specialist advisors: BNPP Real Estate for residential sales values; Cushman and Wakefield for commercial values; and Gardiner and Theobald for build costs. The particular circumstances behind the need for the housing are set out in the CfG and are referred to in the Council's own independent viability report from BPS.

11.50 The applicant states that in addition to the approach to housing, viability remains an issue in its own right and to make the significant investment required Wellcome must, like any charitable trust, target an appropriate return to mitigate the risk of the investment. Trustees are required to ensure compliance with their duty of prudence when assessing such an investment.

11.51 The applicant also states that the nature of homes to be delivered will affect scheme viability, both because of the scale, constrained market, restrictions on occupation and the commitment to delivery of a minimum proportion of rental homes. The applicant's Viability Statement includes two appraisals: a Baseline Appraisal which includes a 10% discount on residential sales values and a Placemaking Appraisal, which removes the 10% discount on residential sales values and increases the commercial values by 10%. The Placemaking Appraisal is an enhanced appraisal in line with Wellcome's aspirations for the site benefitting from investment in the public realm and buildings to achieve a high quality place.

11.52 Key inputs for the two appraisals include:

- Assumed phasing over 11 years
- EUV+ £37-55m (not accounted for in the Residual L.V.)
- Residential sales values of £407psf (Baseline), £453psf (Placemaking)
- Residential rental £350psf
- Commercial: £32.5psf (Baseline), £35.75psf (Placemaking)

- Profit on residential sale 17.5% on GDV
- Profit on residential rent 15% on GDV
- Profit on commercial 15% on GDV
- Profit on affordable 6% on GDV
- Infrastructure costs of £310m
- Finance interest 7%
- Land acquisition costs 6.8% (not accounted for in the Residual L.V.)
- Contingency 5%

#### Applicant's Modelling Outcomes

- 11.53 These are set out in section 5 of the applicant's Viability Statement, produced by QUOD (August 2019). It concludes that by adopting the default values, the Baseline Appraisal results in a residual land value of minus £110,280,536. The Placemaking Appraisal results in a residual land value of minus £43,084,064.

#### Independent Assessment of Viability

- 11.54 BPS are the Council's appointed viability assessors for the scheme. They have reviewed the applicant's latest Viability Statement and related Housing Statement of August 2019. They have appointed their own cost consultants.
- 11.55 The overall conclusions in respect of viability are set out by BPS in paras. 2.31 - 2.37 of their report and are set out below:

*2.31 The Quod appraisal has been based on the assumption that the 30% housing will be for either discount rent, discount sale, or for sharers.*

*2.32 The proposed costs have been assessed by our retained Cost Consultants – Geoffrey Barnett Associates and as can be seen from their report their assessment broadly coincides with the costs adopted by Quod within their appraisal and as such can be considered reasonable.*

*2.33 We have also undertaken our own research into prevailing residential values and conclude that the guidance on unit values provided by BNP appears sound. We have reviewed the values adopted in relation to the Campus Affordable units and have found the valuation inputs to be reasonable.*

*2.34 On a similar basis we have undertaken our own research into prevailing commercial rents and yields and conclude that the advice prepared by Cushman & Wakefield appears realistic and comprehensive.*

*2.35 Quod's development appraisal shows a very considerable deficit which effectively means overall developer's profit falls to almost half the rates included in the appraisal with no allowance for land value. We have found the inputs adopted by Quod to be broadly reasonable and we have not suggested any revisions to the appraisal at this stage.*

*2.36 We have noted in Section 7 our recommendation that a comprehensive review mechanism should be considered by the Council. Given the timescales of the project it is likely that the scheme could morph and there is scope for variation in both costs and values in line with changes in market conditions.*

*2.37 Development appraisals are highly sensitive to relatively small changes in appraisal inputs and that given the anticipated period for delivering this*

*development it is highly probable that viability would be likely to change over time. A review mechanism would allow the use of actual costs and values within the appraisal and as such provides a means for reflecting the actual viability of the scheme at stages through its delivery.'*

### *Objections*

- 11.56 Hinxtion Parish Council has provided separate comments on the applicant's Viability Statement. The issues raised include that the:
- 10% reduction to sales Baseline undermines argument for quantum of housing.
  - £37-55m (62m) Benchmark Land Value is inflated. It should be approx. £4m.
  - £310m infrastructure costs are inflated and require full justification; valuation assumptions should be adjusted accordingly.
  - 81% Gross Internal Area assumptions are low and should be checked.
  - 7% finance rate is high. It should be 5.5%.
  - letting and sales fees are assumed at market rates, but these would be much lower.
  - 6.8% land acquisition costs should not be included as the land is already owned by Wellcome.
  - valuation yields for pre-lets appear conservative.
  - values for residential rental appear low.
  - funding arrangements lack evidence of Wellcome's investment structure.
- 11.57 BPS has provided further advice to the Council on the Hinxtion PC's concerns. This advice is set out below.

### *Benchmark Land Value (EUV+)*

- 11.58 In respect of EUV+, Quod estimate this to be between £37-55m. BPS share the concerns raised by Hinxtion PC and advise in the current circumstance, the site would not come forward for development were it not part of the unique development. The Expansion Land would not have potential for other uses other than its current agricultural use value, therefore a strict interpretation of the NPPG suggests that the level of incentive should not need to be significant and that an enhanced land value is not the critical requirement in bringing the scheme forward. In the context of the land's potential for other uses, BPS consider a value closer to agricultural value to be more appropriate. The issue of land value has not been explored further because the scheme is showing such a considerable deficit even before land value is allowed for.
- 11.59 It should be noted that Quod's appraisal does not include a benchmark land value and that their appraisal shows a £100m negative residual value before any allowance for land value has been made, as such the assessment of viability is not influenced by Quod's view of land value at this stage.
- 11.60 The £58m within the Baseline Model and £62m within the Placemaking model which Hinxtion PC refer to is not a benchmark land value, rather, a deduction made from the gross development value to allow for purchasers' costs in calculating the net development value of the scheme. This is a normal valuation allowance.

### *Infrastructure Costs*

- 11.61 Hinxton PC note the estimate of £310m for infrastructure costs which they recommend should be analysed in detail. At outline stage it is difficult for BPS to assess these costs in detail because detailed drawings and phasing plans are not required. A review mechanism is recommended by BPS to account for changes in these costs.

*Gross to net floor space*

- 11.62 Hinxton PC state that the gross to net ratio for residential space is 81%. BPS do not have any details regarding this but suggest that this point be revisited once plans for each phase are drawn up.

*Finance rate*

- 11.63 The finance rate assumed by Quod is 7%. This is, in BPS's experience, a reasonable allowance to include arrangement fees. The assessment is a generic assessment of viability and as such specific funding options have not considered.

*Lettings and sales fees*

- 11.64 Lettings and sales fees have been considered on a generic basis. Regarding land acquisition costs, although Quod state that these would be included as a standard rate of 6.8%, there are no land acquisition costs within the appraisal given the negative residual value output.

*Commercial pre-let yields*

- 11.65 Hinxton PC consider that the valuation yields appear conservative for the pre-let commercial space. A yield of 5.25% has been used as advised by Cushman and Wakefield. BPS have not identified any evidence to dispute the yield adopted. A late stage review would pick up any adjustments to values over the course of the development.

*Value of rented accommodation*

- 11.66 At outline stage BPS do not have specific details regarding the mix of the rented units, however, they note that these include sharer units and Campus affordable rents which are up to 70% of market rent. BPS are satisfied with the information provided to date however, again, a review would pick up any adjustments to values over the course of the development.

*Funding of the development*

- 11.67 BPS do not have any details regarding Wellcome's funding arrangements as this is personal to the developer and falls outside of the normal generic approach required to be taken when considering viability in a planning context.

Review Mechanism

- 11.68 BPS advise that if actual costs vary considerably from those assumed, there may be further scope to justify an increase in on-site Campus affordable housing. Such an approach would be in line with NPPG guidance given the:

- extent of flexibility being sought by Wellcome for example in unit size and the rental/sale mix.

- significant infrastructure costs, some of which could be shared/reduced if other proposed strategic development sites come forward (AgriTech/NUGC such a waste water improvements, electricity connections).
- potential fluctuations in inputs (costs and values) over time for such a significant project.
- Concerns regarding Existing Use Value+.

*Overall*

- 11.69 Officers consider that it would be inappropriate to secure off-site contributions towards traditional affordable housing because the scheme is not seeking to meet District wide need but the specific needs of the expanded Campus on-site. As it currently stands, the offer of 30% Campus 'affordable' housing is put forward by the applicant on the basis that there is no review mechanism. This is because of the considerable deficit that has been assessed, which as noted above, does not account for EUV+. As such, Officers consider that it is unlikely that any review would result in a financial surplus arising from the scheme that would render a justifiable request for an uplift in its Campus 'affordable' housing component. As such, a review mechanism does not currently feature as part of the HoT's.
- 11.70 This notwithstanding, if Members of the Planning Committee were minded to seek a review, it would have to secure the proposed Campus 'affordable' housing commitment of 30% as a baseline from which the housing offer on site could only improve upon in order to safeguard the Council's negotiating position. This may be difficult to agree because the applicant has already improved their offer notwithstanding a position of viability deficit. Such a review mechanism, if sought by Members, would address the concerns identified by Hinxton PC in its response to viability. Any such review mechanism would have to be subject to further detailed S106 negotiations that would have to be delegated to officers should the application be endorsed for approval.
- 11.71 As such, given the purpose of the Viability Statement, the provisions of policy H/10 and the existing housing offer of 30% Campus 'affordable' housing, officers advise that there is sufficient evidence to proceed on the basis that the housing offer is reasonable.

**12.0 Supporting Uses: Education, Community and Health**

- 12.1 Policy TI/9 states that local circumstances, including increasing pressure on provision of places, must be assessed for proposals for education facilities in order to achieve the most sustainable development. The policy seeks new or enhanced education to fulfil criteria including being appropriately located to the community they serve.
- 12.2 Policy SC/2: requires that new development will have a positive impact on the health and wellbeing of new and existing residents and requires certain planning applications to be accompanied by a Health Impact Assessment.
- 12.3 Policy SC/4 requires that all housing developments will include or contribute to the provision of the services and facilities necessary to meet the needs of the development. It states that in making assessments of need and the timing of delivery of the service or facility, account will be taken of capacity at existing facilities in the locality, their accessibility and of other local circumstances.
- 12.4 Policy SC/6 provides guidance on the provision of indoor community facilities to meet the need generated by the development. It sets a standard for the hall

space as 111m<sup>2</sup> per 1,000 population with additional ancillary space to be on-top of this. It also allows for contributions to be made off-site as appropriate to the size of the scheme.

- 12.5 Chapter 8, 'Promoting healthy and safe communities' of the NPPF is relevant.
- 12.6 The ES, chapter 18 (Socio-economic effects), sets out the approach to mitigate impacts associated with the development. Based on Census (2011) data on household size and the indicative housing mix set out above, the completed development would be expected to have a resident population of approximately 3,021 people.
- 12.7 The applicant confirms that the proposal will have the capacity for the following social infrastructure:
- Health Centre – up to 500 sq.m GEA General Practice (GP) surgery space, or similar
  - Fitness centre – up to 4,000 sq.m GEA
  - Community hall – up to 350 sq.m GEA
  - Cultural facility – up to 5,000 sq.m GEA
  - Nursery – up to 500 sq.m GEA space built to shell and core to provide up to 120 nursery places for children of Campus related workers
  - Primary school – up to a two form of entry (FE) school on site (if required)
  - Technical Education Facility – up to a 250 place facility that would support the Genomics and Biodata scientific and research objectives of the Campus (if required).

#### Education

- 12.8 The County Council, as the Local Education Authority (LEA), has provided advice in relation to the range of educational needs arising from the proposed 1,500 homes. Their advice is reflective of the unique nature of the application coming forward and of the flexibility in unit sizes sought. The County advice has considered NW Cambridge as an example of where a bespoke child yield - lower than the standard multiplier - was agreed. The County advice was revised in July 2019 in respect of primary school provision.

#### *Early Years*

- 12.9 Three early years facilities are within 2.5km of the site: Crocus Early Years Centre on the existing Campus which provides full day care; Duxford Pre-school ages 2-5; and the Chesterfords' Preschool in Great Chesterford ages 2-4. Both pre-schools only operate during term-time.
- 12.10 The County Council advise that all three providers are full or close to existing capacity and that the facility will need to be open for the earliest occupations. The applicant estimates that the development would be expected to house between 126 and 260 children of pre-school age. A proportion of these would require nursery provision. Not all early years children will require early years places, and some will find provision with private childminders, family or alternative providers.
- 12.11 The S106 HoT's seeks to secure the provision of an early years facility in two phases: first phase provision of 60 places (315 sq.m), extended to a second

phase to provide 120 places (490 sq.m). The outline application parameters include capacity for up to 500 sq.m. It is likely the nursery would be managed by a contracted nursery provider. It would either be provided as a shell and core for a provider to occupy or be provided to an agreed specification with a confirmed provider. The first phase would be delivered prior to the first occupation of the housing.

### *Primary*

- 12.12 The range of potential primary school yields have been considered by the County in relation to the upper and lower housing mix profiles provided by Wellcome (see para. 11.36 onwards). These yields result in a range of need from a 0.7 of FE (143 primary aged children) to a 2FE (413 primary aged children). The County state that the yield ranges quoted by the developer in the ES reflects the low to middle of the possible outcomes and there is a possible scenario that produces higher numbers based upon the maximum no. of 3 & 4-bedroom properties being built out. The County confirm that the planning assumptions should focus on managing a 1.3FE (a middle ground estimation of child yield = 280 primary aged children) with a contingency to support a further 0.7FE if required.
- 12.13 In terms of mitigation, the County confirm that in order to meet the demand for places arising from the combination of scenarios, off-site contributions towards increased capacity at Duxford (the closest primary school to the site approximately 3.6km walking distance to the north-west) are no longer being sought as primary mitigation. It is proposed to secure a primary school of up to 2FE of capacity on site. This would require the S106 agreement to secure the provision of a 2.3ha site together with financial contributions. This would be in two phases: Phase 1 – 1FE with a 2FE core and Phase 2 – 1FE expansion based upon need with a review mechanism.
- 12.14 The County suggest an early transfer of land within 12 months of commencement of development and early payment triggers in order that works can be undertaken upfront to deliver places in anticipation of the emerging demand. Given the wide range of potential child yields, a delay notice for the provision of land and/or contributions – which are estimated to total £9,570,000 - is suggested to give flexibility in terms of the timing of the mitigation with a final decision regarding on/off site provision to be no later than 500 occupations. The approach is reasonable.
- 12.15 Whilst the application does not seek to define a location for a primary school, Wellcome has engaged with the County Council regarding potential options. Officers are confident that should on-site provision be required that the masterplan is suitably flexible to allow for a primary school to be delivered which would meet the County's adopted specifications.

### *Secondary*

- 12.16 Within a 3-mile radius, there are two secondary schools; Sawston Village College and Linton Village College. Sawston Village College is the catchment school for children from Hinxton. It is approximately 5km to the north. Sawston Village College is a 7FE secondary school and has an overall capacity of 1,050 pupils. It currently has 17 surplus places available across all year groups. The County advise that the surplus is below the recommendation of 5% surplus included in the National Audit Guidance. Linton Village College is operating over capacity and is not easily accessible from the site by foot or cycle.

- 12.17 The ES estimates that the secondary school child yield could be between 97 – 99 children. The County seek a contribution towards a 1FE (150 place) expansion of Sawston Village College. The level of contribution has not been identified. This is to be calculated on approval of each reserved matters application based on the forecast yield generated by applying the County Council's detailed multipliers to the approved dwelling mix.

*Technical Education Facility*

- 12.18 The parameters of the application allow for the provision of up to a 250-place facility that would support the genomics and biodata scientific and research objectives of the Campus. The applicant confirms the aim of such a facility would not be to duplicate existing provision but respond to Government objectives to improve technical as well as standard academic routes, and to ensure appropriately skilled people for the growth sectors of the future. The County confirm that there is some concern over the viability of post-16 provision and there has been closure of existing provision in recent years but that it would be fully supportive of the Campus working alongside existing providers to offer specialist educational provision. The applicant is aware that there has been mixed experience of some types of provision in other sectors but, given the medium to long term nature of the development it considers it appropriate to provide physical capacity should it be required.
- 12.19 The ES confirms that if a technical education facility was not delivered it would have a negligible effect. The provision is not a planning requirement within the scope of policies SC/4 and TI/9 but is nonetheless supported in order to support the overall Campus vision.

*Overall*

- 12.20 The approach to educational provision accords with policies SC/4 and TI/9.

Community Facilities

- 12.21 A Social Infrastructure Strategy, including a Draft Outline Facilities Access Statement is appended to the applicant's Planning Statement. This sets out the process through which the approach to community facilities has been developed and includes a baseline assessment, a summary of community and stakeholder consultation, and an impact assessment. The applicant confirms that their Social Infrastructure Strategy aims to:
- Mitigate the impacts associated with the resident community expected to live on site – in line with SCDC policy requirements.
  - Support the overarching vision of the Campus with respect to meeting its scientific, business, cultural and educational objectives.

*Permanent Facility*

- 12.22 The masterplan includes capacity for a 350 sq.m community hall and the applicant seeks to secure this as a permanent facility on the Expansion Land. Policy SC/6 requires a hall of 335 sq.m and the S106 would secure an outline specification for this to be submitted alongside the first RM's application for housing. The hall is to be of a size sufficient to accommodate a full-size badminton court in line with Sport England advice. Ancillary facilities increasing the overall provision above 350 sq.m are also to be secured. The outline

specification would include the need for flexible space and an assessment of accommodation needs for a range of activities/services including health, children & family, adult learning, library fit out and ancillary spaces such as a foyer, café space, meeting rooms, activity space, kitchen, toilets, storage & parking to support the facility.

- 12.23 The precise layout and size of the building would need to be subject to a design development process that would take place at a later stage, as it is important that the final design reflects the outcomes of consultation with key stakeholders including the local authorities, residents and other community groups and the emerging new community within the development itself. It is not certain at this stage as to whether the community facility would be a standalone building or form part of a joint building, such as for Wellcome's Connecting Science programme. In the latter case, ancillary facilities could form part of a shared provision. The S106 HoT's requires the timing of delivery to be reviewed and updated with each housing RM's but that it should be no later than the occupation of the 500<sup>th</sup> unit. Provision would be in accordance with an agreed Community Development and Support Strategy to be agreed with the Council, which would secure amongst other matters the specification for the facility and its final timing.

#### *Temporary Facility*

- 12.24 Officers also seek temporary community facility provision, as it is essential that community space is available from the point of first occupation of the housing, prior to the provision of a permanent facility. This is set out in the S106 HoT's and could either be in the form of the utilisation of existing facilities at the Campus or the provision of a temporary facility on site.
- 12.25 The approach to permanent and temporary community facility provision accords with policies SC/4 and SC/6.

#### *Hinxton Village Hall and Open Spaces*

- 12.26 Hinxton PC has written to the Council asking for the community impacts on Hinxton to be mitigated by the applicant.
- 12.27 Hinxton PC state that the existing village hall and playground are accessed and used by significant numbers of Genome Campus employees, their spouses and families. They indicate that such usage would increase markedly in the future. Officers agree that, notwithstanding a permanent facility to be provided on site, the development of the Campus would be likely to generate demand for the use of the village hall and its nearby recreational space. This is because it is an established community facility and together with the Red Lion PH and St Mary and St John Church, will attract use from future occupants of the Campus, particularly as the application seeks to promote links to and from Hinxton via New Road and envisages the wider Campus being opened up to public access.
- 12.28 Policy SC/4 allows for account to be taken of capacity at existing facilities in the locality, their accessibility and of other local circumstances. The supporting text to policy SC/7 allows that for on individual sites negotiation may take place on the types of space provided on site, taking account of the needs of the area, existing provision and any identified deficiencies in provision. The policies provide a standard of provision in relation to housing development. There is no standard of provision for employment areas under E/10 or for a mixed employment / housing led scheme such as that proposed. The applicant envisages employee use of the community infrastructure and open spaces to be provided on site. It is therefore

reasonable to assume that additional impact on Hinxton village hall and the open spaces within Hinxton would arise. The principle of securing some local mitigation within Hinxton is therefore reasonable. The extent of the mitigation sought / offered is a matter of judgement for the Council.

- 12.29 The existing village hall in Hinxton provides a main meeting space with seating for up to 90 people and associated kitchen, toilet and parking facilities. There is an outdoor play area nearby. Hinxton PC state that the existing hall would not be able to manage increased capacity and set a preference for the provision of a new hall and improved parking, potentially on the same or on adjacent land in the centre of the village (a draft specification for this is provided). As an alternative, works to extend or refurbish the existing hall are set out by the PC. The use of additional recreational space (within the current ownership of Wellcome) within the village is also sought together with additional recreational facilities (playing fields / play equipment), an area for biodiversity and an orchard. No values for this mitigation are identified in the latest correspondence from Hinxton (Sept).
- 12.30 Wellcome provided a response to the request on 13 Oct 19 confirming that they are willing to make contribution to Hinxton PC of £250,000 to cover recreational space / facilities enhancements. They confirm that the field adjacent to the village hall is currently let on a Farming Business Tenancy and falls within the Higher Level Stewardship agreement for the wider estate and that it is used for grazing cattle. Wellcome confirm that land immediately adjacent to the current playground could be made available (subject to notice period) on a temporary basis to cover increased usage by new residents until permanent facilities are delivered on the Expansion Land or for a defined fixed term.
- 12.31 In officers' view, whilst this response is encouraging there is no justification for the level of contribution offered or what this could practically deliver to mitigate the likely long-term increased demands on the village hall. Neither is there an indication of precisely what land could be made available, for what time period and under what terms it could be offered. Officers are of the view that the level of contribution would be unlikely to be able to deliver a new community hall which is Hinxton PC's preference. Members will have to bear this in mind and the fact that a permanent community facility is to be provided on the Expansion Land in terms of the overall consideration of need and necessity.
- 12.32 The S106 HoT's provides for community facility mitigation. In the view of officers, the range of community facilities being sought (temporary, permanent on-site, off-site improvement / re-provision and improvement to and / or further provision of recreational facilities and land) has justification and would comply with policies SC/4, SC/6 and TI/8. Subject to further satisfactory resolution of off-site provision for the village of Hinxton to be negotiated and agreed by officers the proposal is acceptable.

#### Community Development Support

- 12.33 The supporting text to policy SC/4 states that new developments take time to develop and that support is needed to help people to settle and start the groups, clubs and activities found in more established neighbourhoods.

#### *General Support*

- 12.34 Wellcome already provides extensive support for the current working community, which it intends to extend to the expanded Campus. Officers consider that this commitment should be secured through in-kind support equivalent to 0.5 FTE

(£18,850pa) over 5 years, which would require a financial commitment of £94,250.00. This support would be for general community development to support placemaking in the new community and integration with the existing community through a programme of activities/events, regular liaison with residents, provision of information and signposting etc.

### *Specialist Support*

- 12.35 The County Council has highlighted a range of potential specialist community support provisions. These are set out in the table below.

<b>Phased funding requirements Cost Summary</b>	<b>Amount</b>
Total kickstart funding	£15,683
Mental health training (level 2)	£10,200
Mental health counselling services	£2,400
Locality staff (2 years)	£112,500
Children centre staff (2 years)	£41,432
Children centre equipment/activities	£18,750
Domestic abuse kickstart funding (if Level 2)	£2,700
Specialist community development worker (2 years) if level 2 or 3	£37,500
Multiagency coordination if level 2 or 3	£23,750
Healthy New Towns initiative legacy (project workers)	£18,750
Healthy New Towns initiative legacy (kickstart funding)	£8,400
<b>Total</b>	<b>£292,065</b>

- 12.36 The type of support would be for more vulnerable residents who often struggle to engage in more general community development work and to combat loneliness, poor mental health and antisocial behaviours resulting from a lack of community cohesion and social networks.
- 12.37 Officers consider that providing services for the new Campus residents presents a challenge as it is difficult to predict the needs of a community before it forms. For the expanded Campus, particular needs will arise from the transient nature of its community, the anticipated levels of rental property (min. 60% or 600 homes) and different population characteristics to the surrounding area, with a potentially large international pool of employees who may themselves or whose partners/children may have language barriers.
- 12.38 The applicant considers that they are best placed to provide the support for the future Campus community. Officers seek a level of specialist support of no less than £292,065 to be provided by the applicant. This approach is reflected in the HoT's. It does not preclude the applicant from procuring specialist services provided by the County Council as required.

### *Community Development and Support Strategy*

- 12.39 In order to secure the level of general and specialist support envisaged as necessary and to ensure the timely provision of community facilities, a Community Development and Support Strategy (CDSS) is suggested to form part of the S106 HoT's. This would need to be agreed with the Councils and outline the nature of support to be provided and when. The CDSS would be agreed prior to the occupation of any homes. As the scheme develops, the needs of the new

Campus community may change and as such officers suggest that the CDSS is monitored yearly and reviewed at 1, 2 and 4 years from first occupation.

#### *Community Chest*

- 12.40 The applicant has agreed to provide a sum of £20,000 to support community development through grant funding for community-led initiatives on site. This would be administered through the SCDC Community Chest (small grants scheme).

#### *Apprenticeships*

- 12.41 The applicant's S106 HoT's includes the commitment to the preparation of an Apprentice Construction Strategy. This would be secured in the S106.

#### *Overall*

- 12.42 The approach to securing appropriate community support for future residents accords with policy SC/4.

### Health

#### *Health Impact Assessment*

- 12.43 The applicant has submitted a Health Impact Assessment (HIA) as part of their application. This considers the health care requirements of the new residents, and assesses how those needs will be fulfilled, taking into consideration existing facilities within the area. The HIA was submitted as part of the original submission and supplemented with an addendum in April 2019 in order to address concerns. It has been assessed by both SCDC and County officers and is deemed acceptable, meeting the required standard of the HIA SPD (2011).

- 12.44 Of note in the HIA is a commitment from the applicant to seek to embed the principles of the draft WELL Community Standard in the design of the development. The Standard is set out in appendix B to the original HIA. It comprises 10 draft mandatory conditions and aims to impact individuals not just within the walls of their home or workplace, but throughout the public spaces where they spend their days. It includes an independent certification process and is designed to support the health and well-being across all aspects and areas of community life. Officers support the applicant's commitment to embed these principles.

- 12.45 A statement of compliance with the HIA at the RM's stage is to be secured by condition. The approach complies with policy SC/2 and the HIA SPD (2011).

#### *Primary GP Health Services*

- 12.46 The ES (chapter 18) confirms that there are two GP surgeries within 2.5km to the south of the site in Great Chesterford. These are Crocus Medical Practice and the Gold Street Surgery. Sawston Medical Centre (part of Granta Medical Practice group) is 3km to the north and is a large 10 GP centre that runs a range of health services including antenatal care, asthma, cardiovascular, COPD, and diabetic clinics, and provides a range of long-term medical condition care, and minor

injuries and surgery services. A pharmacy is located on site. The ES confirms that the three GP surgeries have an average of 2,450 registered patients per GP which is higher than the recommended benchmark provision of 1,800 patients per GP, however all three surgeries are currently accepting new patients.

- 12.47 The ES estimates a residential population of 3,021 people and suggests potential demand arising from the development of the equivalent of 1.7 FTE GP's. It is understood that Sawston Medical Centre has physical capacity within its existing building to offer additional services / expand its patient list should demand arise.
- 12.48 The development includes capacity for the provision of a health centre of up to 500 sq.m GEA on the Expansion Land, should the demand arise. This could be an NHS or private facility and it could also be in the form of a satellite service to an existing medical practice. The applicant has approached Granta Medical Practice in this respect and at the pre-application stage they expressed interest in developing closer links with the Campus to meet the medical needs of existing and future staff and residents. However, no formal response from the Practice has been received as part of the consultation.
- 12.49 The Cambridgeshire and Peterborough Clinical Commissioning Group (CCG) has responded late into the consultation process. The CCG seek a S106 contribution of £567,771. This is based on their NHSE planning formula of the amount of floor space required x £2300. They advise that they do not wish to allocate the sought funding directly to Granta as the primary care landscape is changing. They request the flexibility to utilise the funding towards 'health'. The CCG's response runs counter to the initial advice received from Sawston Medical Practice and provides no detail as to the need for the contribution or how it would be used to directly mitigate the impacts of the development. Officers have advised the CCG that the request for a contribution does not meet CIL Regulation 122 requirements. Any further responses from the CCG will be reported on the Update sheet, however, as it currently stands there does not appear to be any demand for an on-site facility and there is no justification for a contribution off-site. Officers seek delegated authority under the S106 HoT's for the resolution of this matter.

### **Community Access**

- 12.50 The supporting text to policy SC/6 'Indoor Community Facilities' seeks to secure that all residents have access to facilities which are appropriate and suitable for their needs. Policy SC/7 'Outdoor Play Space, Informal Open Space and New Developments' emphasises that access to good quality open space and children's play facilities has significant benefits for community health and wellbeing. Policy HQ/1 'Design Principles', states that as appropriate to the scale and nature of the development, proposals must achieve a permeable development with ease of movement and access for all users and abilities.
- 12.51 The applicant's Planning Statement includes an Outline Facilities Access Statement. This summarises intended community access as follows:

#### General Site Access

12.52 The development would provide a range of uses to which local people and the wider public would have access. This would include the public realm such as open spaces, play spaces, roads and parking and accesses into and out of the site. Increased access to the public realm would also extend to the existing Campus as well as the expanded Campus. Access arrangements to buildings providing independent retail, food and drink uses, leisure facilities and visitor and community facilities would also be available. A few existing employment buildings will require additional security arrangements to allow for wider public access across the Campus. This will be achieved within buildings.

12.53 The applicant states that opening the Campus up to provide public access is a key principle of the development and will be essential to its future success as an exemplary living and working environment with a strong sense of place.

12.54 Specific provisions for uses are set out in the Outline Facilities Access Statement and are as follows;

#### Nursery

12.55 Nursery places would be prioritised for children of Campus Related Workers and Campus residents. The allocation of places would be managed by a nursery provider.

#### Sports Pitches

12.56 There would be no restriction on public access to use of sports pitches. Arrangements would be managed through a third-party operator or Wellcome in line with a principle of managed public access. There is likely to be a booking requirement and fee for use of the pitches.

#### Health Centre

12.57 Should provision be required on site (500 sq.m is reserved in the masterplan and land would be reserved as part of the S106), access would be managed through an NHS or other provider, and would likely operate on a catchment area basis with access prioritised for Campus Related Workers and residents living and working close to the facility.

#### Community Hall

12.58 Access would be managed through Wellcome in line with a principle of managed public access. There would be a booking requirement and fee for use.

#### Primary School and Technical Education Facility

12.59 Access arrangements relating to primary school provision on-site would be determined by the relevant school admission authority (the Local Authority or provider Governing Body) and would be in line with the Schools Admissions Code 2014. At the time of arranging admissions criteria, oversubscription criteria would be established and would be expected to include a principle of applying a catchment area for the school whereby generally children living closer to the

school site will be prioritised for access, alongside principles of, for example, prioritisation of siblings of existing students.

#### Leisure Centre and Visitor (Cultural) Facilities

- 12.60 Public access would be provided for leisure uses. The operator of any such leisure/fitness facility is unknown but officers assume that there would be likely to be a fee for the use of indoor leisure facilities, such as a gym.
- 12.61 A visitor centre (Connecting Science) is envisaged and the applicant proposes that public access to this would be provided.

#### *Officer Conclusions on Community Access*

- 12.62 Opening up the existing and future Campus to public access across its public realm is a step change in how accessible and outwardly visible the site is intended to become. It is a major commitment on behalf of Wellcome. This measure will require alternative security arrangements to be put in place for buildings, the removal of the existing security access from the A1307 and alternative gated arrangements from New Road. A specific condition proposed within appendix A would secure the provision and timing of this.
- 12.63 This is an outline application and as such there is no detail as to how access would be managed for the proposed community facilities, on what terms for the wider public and at what cost. Clearly there are benefits in making the best use of the proposed community infrastructure, which includes extending access to the wider community. In general terms, the proposed access arrangements are to be supported but as this is an outline application, the detail of the access arrangements, their management and their costs will have to be agreed as part of detailed Access and Management Statements (S106 HoT's) for each of the following facilities: community hall; cultural visitor facilities such as a Connecting Science building (D1 uses); indoor leisure facilities (D2 uses); outdoor sports pitches; allotments; and educational facilities (where shared facilities such as sports facilities or community space might be provided). These are to be secured within the S106.
- 12.64 Subject to these provisions being secured, the application accords with policies SC/6, SC/7 and HQ/1.

#### **Estate Management**

- 12.65 Policy CS/4 'Meeting Community Needs', identifies that as appropriate to the nature of facilities provided, developers will prepare management and maintenance strategies, to be approved by the Local Planning Authority, to ensure robust and effective implementation, adoption and maintenance in the long term.
- 12.66 A draft Estate Management Strategy was submitted as part of the original submission in Dec. 2018. This provides an overarching summary of how different parts of the scheme, from construction to occupation, are envisaged to be managed and how these would be secured through any grant of planning permission.

12.67 The table below sets out how the key elements of the scheme are to be managed.

<b>Topic</b>	<b>Method of Management</b>
Construction	Construction and Environmental Management Plan (condition)
Landscape	Landscape and Ecological Management Plans (Annexures B and D of the proposed conditions in appendix A).
Transport	Site-Wide Travel Plan, Car Park Management Plans and provisions to monitor and mitigate rat-running (S106).
Roads	Prior to any adoption of internal estate roads, a management and maintenance plan for these would also be secured within the S106.
Sustainability	Sustainability Strategy and its management (conditions)
Design	Managed through DAB's and a Design Guide (Annexures B and C of the proposed conditions in appendix A)
Access	Open campus vision (condition)
Security	Individual RM's applications
Public Realm and Open Spaces	Public access and management of these secured through the S106.
Commercial Services	Delivery and Service Plans for occupiers (condition)
Housing	Sales and Lettings Policy + review provision of the Policy and Housing Waiting List (S106).
Waste	Outline Waste Management Strategy (condition)
Community Infrastructure	Individual Access and Management Statements as set out in the officer summary section in 'Community Access' (S106)

12.68 The Estate Management Strategy commits to the establishment of a community liaison group. This would allow for regular channels of communication between the local villages and the development, including its new residents. The applicant confirms that this group would seek to proactively address concerns and potential issues before they arise. It is to be secured by a proposed planning condition and would be managed by Wellcome and/or an appointed estate management partner. As the detailed arrangements for the management of the site and its component parts is uncertain, the S106 HoT's requires confirmation of the management arrangements as the community infrastructure is provided through a detailed Estate Management Strategy.

12.69 The approach to estate management is acceptable and complies with respective LP policies including CS/4.

### **13.0 Supporting Uses: Hotel and Conference, Retail, Leisure and Visitor**

- 13.1 Policy SC/4 'Meeting Community Needs' states that all housing developments will include or contribute to the provision of the services and facilities necessary to meet the needs of the development. The scale and range of this provision or contribution will be appropriate to the level of need generated by the development. Criterion 4(f) states that the community facilities and services to be provided include... Commercial facilities important to community life including childcare nurseries, local shops restaurants and cafes, and public houses. Criterion 5 of the policy states that new retail provision should not undermine the vitality and viability of nearby 'town centres' as defined by the NPPF.
- 13.2 Policy E/10 'Shared Social Spaces in Employment Areas' states that appropriately scaled leisure, eating and social hub facilities will be permitted in business parks and employment areas subject to a number of criteria, including that the uses are ancillary and would primarily be to meet the needs of workers in the business park, not attracting significant levels of visitor traffic into the area. The policy supports the development of complimentary facilities in order to help develop the social milieu of free-standing business parks which are not close to existing comparable village facilities
- 13.3 Policy E/19 'Tourist Facilities and Visitor Attractions' supports proposals for new or extended tourist facilities and visitor attractions in the countryside subject to a number of criteria. The supporting text to the policy sets out that tourist facilities and attractions could include visitor and information centres and that the policy is intended to support the District's existing attractions and assets.
- 13.4 Policy E/20 'Tourist Accommodation' states that outside Development Frameworks, development to provide overnight visitor accommodation, holiday accommodation and public houses will be permitted by the change of use / conversion / replacement of suitable buildings and by small scale new developments appropriate to local circumstances. It places a 4-week limit on stays in such accommodation and is controlled by a proposed planning condition within appendix A.
- 13.5 Policy E/21 'Retail Hierarchy' provides a spatial retail hierarchy for the District, whereas policy E/22 'Applications for New Retail Development' advises that proposals involving additional retail floorspace resulting in a retail threshold over 250 sq.m outside village centres should be accompanied by a Retail Impact Assessment. These policies are directly engaged in terms of the Town Centre Uses Assessment submitted by the applicant. Policy E/23 'Retailing in the Countryside' provides support exceptionally for the sale of convenience goods, ancillary to other uses, where proposals, either individually or cumulatively, do not have a significant adverse impact on the viability of surrounding village shops, or the vitality of Rural Centres or other village centres.
- 13.6 Officers are of the view that policy SC/3 'Protection of Village Services and Facilities' is not engaged as the application does not propose the loss these facilities.
- 13.7 There are no policies in the Local Plan which directly address the suitability of conference facilities, however, the NPPF defines conference facilities as comprising a main town centre use and this use is assessed as part of the Town

Centre Uses Assessment provided by the applicant which is summarised below at para. 13.14.

- 13.8 The supporting uses are defined in the Development Specification and are as follows:

<b>Use</b>	<b>Amount</b>
<b>Supporting Uses:</b>	31,100 sq.m GEA, including:
Retail (Use Classes A1, A2, A3, A4)	<i>Up to 3,500 sq.m GEA</i>
Hotel (Use Class C1)	<i>Up to 5,000 sq.m GEA</i>
Non-residential institutions, and community and leisure, including nursery, conference facility, and education (Use Class D1/D2)	<i>Up to 22,750 sq.m GEA</i>

Hotel and Conference

- 13.9 A conference centre of 5,000 sq.m (use class D1) is envisaged by the applicant to come forward on the site together with a hotel (use class C1) of no more than 5,000 sq.m. The ES (chapter 18) anticipates a hotel of approximately 150-175 rooms. The applicant anticipates that up to 1,000 sq.m of the hotel floorspace could be used as ancillary space, e.g. for a gym. The level of provision is equivalent to existing Campus overnight accommodation (134 rooms) and conferencing facility floorspace which amounts to 6,000 sq.m combined.
- 13.10 The applicant states the level of provision has been informed by research from commercial agents and known demand and that as the Campus sits at the heart of a national and international network of collaboration the provision of visitor accommodation on site is therefore an essential element underpinning its ability to host such collaborations.

Retail and other 'A' Class Uses

- 13.11 Up to 3,500 sq.m GEA is put forward for retail (Use Classes A1, A2, A3, A4). The applicant states that the retail uses are intended to serve the day-to-day needs of those both working and living at the Campus to reduce external trips and to contribute to a competitive quality of life offer. Such uses are expected to include shops, cafes, restaurants and bars. The retail uses are intended to be of a proportionate scale to the population of the proposed development. The Development Principles (DP4.1), which are sought for approval as part of this application, establish that no single retail unit would have a floorspace of greater than 500 sq.m (GEA).

Leisure Uses

- 13.12 Up to 4,000 sq.m of use class D2 floorspace is anticipated to be a health and fitness centre. The current Campus gym is approximately 400 sq.m and serves approximately 600 people. It is oversubscribed, with demand from members of the local public as well as Campus staff. The proposed leisure floorspace is

considered proportionate to the anticipated increase in the Campus population that would arise as a result of the development.

### Visitor Facilities

- 13.13 D1 uses (non-residential institutions) are envisaged to include a new building of approximately 5,000 sq.m as part of Wellcome's Connecting Science programme. This would constitute a visitor attraction given Wellcome's aspirations and policy E/19 is therefore engaged. The need for this aspect of the development is set out in the CfG at para. 10.83 of this report onwards.

### Town Centre Uses Assessment

- 13.14 The Planning Statement includes a Town Centre Uses Assessment. It includes a Sequential Test and an Impact Assessment covering retail and leisure uses. The following proposed 'Main town centre uses' as defined by the NPPF have been assessed:

Town Centre Use	Category Use	Maximum amount (GEA)
Offices (Use Class B1)	Office	150,000 sq.m
Retail development	Retail (within Use Classes A1, A2, A3, A4)	3,500 sq.m (individual units no more than 500 sq.m)
Leisure and entertainment	Health centre Fitness Centre	500 sq.m 4,000 sq.m
Arts, culture and tourism	Conference	5,000 sq.m
	Hotel	5,000 sq.m
	Visitor or cultural uses for public engagement	4,000 sq.m
	Other cultural use / anchor	1,000 sq.m

- 13.15 The assessment notes that the precise quantum and distribution of the uses is not yet known. These would be defined through DAB's and RM's applications.

### *Sequential Test*

- 13.16 In terms of this test, the applicant states that it is not possible to segregate the [town centre] uses from the Wellcome Genome Campus by locating them within such a centre (or in fact any other location), whilst achieving the objectives or anticipated benefits of the proposal and that it would not be reasonable to disaggregate or reduce the development to fit any available sites as this would compromise the vision of the proposed development. The sequential test concludes that there are no other suitable sites on which the proposed town centre uses could be located and the sequential test is passed.

### *Impact Test*

13.17 The Impact Test assesses the potential impacts of the proposed retail and leisure floorspace separately and assumes an impact area of 10 minutes' drive from the site and a new residential population of 3,021 people together with a new working population of 5,330 people. 'A' use classes (up-to 3,500 sq.m) are to be no more than 500 sq.m for individual units. The leisure use is anticipated to occupy up to 4,000 sq.m of D2 floorspace and is indicated to be a fitness centre.

13.18 It concludes for retail, food and beverage uses that:

- there is no evidence to suggest that the trading effects of the retail, food and beverage floorspace being proposed will lead to significant adverse impact on the vitality and viability of neighbouring centres or on future planned investment. Instead, the retail, food and beverage floorspace will be supported by the substantial on-site expenditure generated. Furthermore, the substantial residual expenditure will also be available to support similar facilities elsewhere in the wider area.

13.19 It concludes for leisure uses that:

- In terms of leisure impact, the nature of local leisure provision is such that the introduction of leisure floorspace within the scheme will not lead to a significant adverse impact on existing provision. The increase in working and living population to the local area as a result of the proposal, which will be available to support existing leisure provision within the local area, means that the effects of the proposal will not adversely impact the vitality or viability of any of the local centres.

*Officer Conclusions on Supporting Uses: Hotel and Conference, Retail, Leisure and Visitor*

13.20 The hotel element of the proposal conflicts with policy E/20 in that its provision would not be a change of use / conversion / replacement of a suitable building and neither would it constitute a small-scale new development. The retail and other 'A' class uses do not comply with the retail hierarchy as set out under policy E/21 and would constitute retailing in the countryside as defined by policy E/23 which only allows exceptional cases where the impacts on viability and vitality on rural centres and village centres is deemed to be acceptable.

13.21 In terms of visitor facilities, any RM's application could determine the appropriateness of a building for this use in terms of its scale, nature and role within the expanded Campus. However, policy E/19 does not lend support to the provision of such a use because, whilst it would likely to enhance the existing assets of the Genome Campus and the CfG identifies a need for the location, the development of such a building, in combination with other buildings on the Expansion Land, would likely result in significant adverse impacts on the character and appearance of the area and be contrary to criterion C of the policy. This harm is confirmed by the Council's retained landscape consultant HBA and discussed later in this assessment.

13.22 This notwithstanding, officers are of the view that that intended scale of the hotel and conference, retail, leisure and visitor facilities would be appropriate to the proposal, support its placemaking function and be complementary to Wellcome's vision for the Campus. In this respect, the supporting level of provision accords with policies SC/4 and E/10 for the housing and employment aspects of the development respectively. In fact, if the range of supporting facilities is to be

realised - together with appropriate access and management arrangements in place - the overall provision and potential benefit for residents and employees together would be beyond those ordinarily arising from either a solitary residential or employment led only scheme. The supporting uses would clearly contribute to the social and economic sustainability of the site and would reduce future occupants' need to travel off-site.

- 13.23 The range supporting uses would not have a detrimental impact on existing facilities within the locality. The Sequential Test and Impact Assessment have been carried out in accordance with NPPF and NPPG guidance and officers accept the outcome of these. This is on the provision that should any of the 'main town centre uses' exceed any of the assessed upper floorspace limits, a proposed planning condition would require a further impact assessment to demonstrate the vitality and viability on nearby local centres would not be compromised.
- 13.24 As such, the supporting uses - as standalone elements - are unacceptable in principle and do not comply with the spatial policies which underpins the LP's approach to their provision. However, officers consider the supporting uses to be an essential part of the applicant's vision for the Campus and there is little merit in the Council disaggregating their respective merits from this. In this respect, the supporting uses - which also include the educational, community and health aspects of the proposal - either succeed or fail as a result of merits to be attached to the CfG and the exceptional case being put forward by the applicant to develop the site.

### **Energy Centre**

- 13.25 The proposed development includes a site-wide low carbon strategy that seeks to meet the minimum 10% carbon emissions reduction, averaged across the site, due to low carbon technologies required by policy CC/3 'Renewable and Low Carbon Energy in New Developments'. A key commitment to achieve the requirement of CC/3 is to provide low carbon heating through an energy centre with site-wide district heating. The energy centre - together with a heat network infrastructure - is to be technology agnostic to allow flexibility to select the most appropriate heat source during detailed design development for RM's applications. The supporting energy centre use, which is estimated as up to 5,000 sq.m in size, is appropriate should outline permission be granted. There is no conflict with policy CC/3 or para. 151 of the NPPF.

### **Design and Layout**

- 13.26 The relevant policies applicable to the design and layout of the scheme are HQ/1 'Design Principles' and HQ/2 'Public Art and New Development'. HQ/1 provides a comprehensive list of criteria by which development proposals must adhere to, requiring that all new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its local and wider context. NPPF paras. 124-130 are relevant.

### **Parameter Plans**

- 13.27 Five parameter plans are put for approval (PP's 1-5). They are attached at appendix D to this report and are to be approved formally as part of the planning conditions. The PP's provide a broad framework within which subsequent RM's applications would have to accord. The PP's can be summarised as follows:

- PP1 defines the maximum extent of the Development Area (extent of built development). It does this by identifying three Development Areas (1-3) which are to be subject to further DAB's and Design Guides for the Expansion Land. Dev. Area 1 is in the centre of the Expansion Land and is to comprise mainly research and translation uses. Dev. Area 3 is to the north of this and is to comprise mainly residential uses. Dev. Area 2 is to the south of the existing Campus on the western side of the A1301 and is to comprise mainly research and translation uses. PP1 identifies indicative locations of neighbourhood / retail / leisure focus, indicative access / crossing points and retained buildings.
- PP2 defines zones of maximum building height. This plan was revised as part of the April 2019 amendments to remove a 20m height parameter. Two maximum height zones are proposed, one which allows for buildings up to 11m and one which allows for buildings up to 16m from proposed ground level. The 11m zone extends across all of Dev. Area 3 where mainly residential properties are to be delivered. It also extends around the outside of Dev. Area 1 alongside the A1301 and A11, where buildings would step down in height. All of Dev. Area 2 is shown to be within the 11m zone. The maximum 16m zone is within Dev. Area 1 only, where the employment and supporting community infrastructure uses are anticipated to be mainly located.
- PP3 defines areas of green infrastructure. It shows areas of retained and enhanced vegetation, a buffer zone with bunding adjacent to the A11, an acoustic bund, retained arable land with new hedgerows, natural and semi-natural space and semi-natural open space or space for outdoor sports. It shows the location of a common adjacent to the A1301 and the approximate location of a green corridor with spurs off it running through the centre of the site. Structural edge planting is shown around the western and northern edge of Dev. Area 3 and in the northern and southern extremities of the Expansion Land.
- PP4 provides for a movement network. It shows indicative primary and secondary routes within the site and new connection points for pedestrians, cyclists and vehicles. There are two primary site access points provided off the A1301, with an additional secondary access further south intended to serve as a service and parking access route. There are additional pedestrian and cycle path access points along the northern section of the A1301 and to Tichbault Road. The primary route provides access to the heart of the Expansion Land, extending around the proposed common and connecting the two key site access points. A secondary route then connects Dev. Areas 1 and 3.
- PP5 relates to highways improvements and defines an area within which highways works including for the A1301 and New Road are to be carried out. The designs shown for the highway works are indicative because the application is in outline form with all matters reserved.

### Development Principles

- 13.28 A series of Development Principles (DP's) accompany the PP's. They are attached to the Development Specification document which was revised in April 2019 and are put forward for approval together with the accompanying PP's. They are attached at appendix E and cover 18 different themes. The DP's account for embedded ES mitigation. Subsequent RM's applications, DAB's and

a Design Guide(s) would have to demonstrate conformity with the DP's, and this is secured through Annexures B, C and D of the proposed conditions set out within appendix A.

13.29 Key DP's include:

<b>DP. No./Theme</b>	<b>Principle</b>
<p><b>Land Use</b></p> <p>DP 1.1-1.3</p>	<p>Of the built development in Development Area 1, the predominant land use shall comprise Research and Translation uses. Land uses in the remaining area may include residential, supporting uses (as defined in the land use schedule), energy centres and utilities, and parking.</p> <p>Of the built development in Development Area 2, the predominant land use shall comprise Research and Translation uses. Land uses in the remaining area may also include supporting uses, energy centres and utilities, and parking.</p> <p>Of the built development in Development Area 3, the predominant land use shall be residential. Land uses in the remaining area may also include Research and Translation uses, supporting uses, energy centres and utilities, and parking.</p>
<p><b>Social Infrastructure</b></p> <p>DP 3.1</p>	<p>Social infrastructure shall be located in prominent locations adjacent to or in close proximity to the main internal access roads, public transport links, and high-quality cycling and walking connections.</p>
<p><b>Parking</b></p> <p>DP 6.1-6.3</p>	<p>Car parking spaces for Research and Translation uses will be consolidated predominately in multi-storey car parks.</p> <p>Open-roof multi-storey car parks will not be permitted.</p> <p>Multi-storey car parks will be predominantly located in the eastern half of Development Area 1 away from main pedestrian routes/places of gathering and to encourage movement through the site by foot. In the early stages of the development temporary ground-floor or on-plot parking lots may be delivered. Reserved Matters applications shall clarify whether any car parking proposed is temporary or permanent.</p>
<p><b>Building heights, massing, layout and orientation</b></p> <p>DP 7.6</p>	<p>In designing the edge of a Development Area, consideration should be given to measures to integrate the Development Area into the Site's context, in particular through the design, appearance and massing of buildings. This should include the stepping down in height of buildings and variation / modulation of the building line where this would help minimise landscape visual impact. This principle will not prevent modern or innovative design.</p>
<p><b>Rooftop equipment (including plant, flues and</b></p>	<p>Save for the exceptional circumstances set out in DP8.2, rooftop equipment and plant shall not exceed the maximum building heights identified on Maximum Building Heights Parameter Plan (PP2). Plant should be designed into the overall composition and design of buildings wherever practical. It should be integral to</p>

<b>antennae)</b> DP 8.1	the design such that it is perceived as part of the intended form and shape of a proposal building.
<b>Ecology and Biodiversity</b> DP12.1	The approach to ecology and biodiversity will be to establish a landscape that is functional and attractive. It will: i. support biodiversity conservation for important ecological features; and ii. improve and enhance the biodiversity value of the site, achieving an overall net biodiversity gain of 10% or more.  This will be achieved in accordance with the measures in the Environmental Design and Management section 9.5 of Chapter 9 of the ES.
<b>Landscape, Visual and Heritage Impact</b> DP 13.2	Green infrastructure will support the integration of built development into the landscape. This will include: i. Early delivery of structural edge planting to filter and selectively screen views (as identified on the Parameter Plan 3 (PP3) and as described below); and ii. Use of green and brown roofs where feasible.  The structural edge planting shall take the form of informally but closely spaced copses of trees as a layer of green to soften the built edge in the manner of historic linear settlement and woodland patterns seen in the area.

### Design and Access Statement (DAS)

13.30 The DAS confirms that together the PP's provide for the following:

13.31 An Open Space Framework that includes:

- A common at the heart of the Expansion Land.
- A significant setback from Hinxtton Conservation Area to the north of the site.
- A planted bund along the A11 to protect the development from noise.
- Retention of key landscape elements such as the existing woodland along the old railway cutting, hedgerows, and the east-west valley.
- Introduction of green corridors through the site for drainage as well as amenity.

13.32 A Movement Framework that includes:

- Three points of vehicular site access from the A1301.
- A primary loop road going through the research and innovation zone.
- Secondary loop roads to the north and further east to access homes and parking.
- A network of cycling and walking routes through the site and vicinity.

13.33 Dev. Areas that have been located to:

- Consolidate a research and innovation zone to the south linking the existing Campus with the Expansion Land. More compact and taller buildings (up to 16m) are located in this area.

- Create a lower-scaled Development Area to the north predominantly residential in character (up to 11m).

#### *Common*

- 13.34 The DAS states the development will be anchored by a generous new green common at its heart as an extension of the gardens surrounding Hinxtton Hall. Located directly across the A1301 from the Existing Campus between Hinxtton Hall and the Sanger Institute, the new common would offer the opportunity to connect the emerging campus to the existing one across a traffic-calmed A1301, on to the accessible wetlands and river Cam valley further west. The applicant sets out that framed by a diverse mix of public uses, the new common would be an invitation to all - staff, residents, and visitors of the expanded Campus, as well as the wider local community - to participate in its expanding programme of public engagement, or just to use and enjoy the open space. The common is approximately 2.7 Ha (just under a third of the size of Parker's Piece in Cambridge). It is to take inspiration from the design and quality of historic village greens with their informal landscape treatment and public uses within the green and in adjacent buildings. The common is safeguarded within PP3 and DP 10.2.

#### *Valley*

- 13.35 There is an existing drainage channel running roughly east-west through the centre of the site (approximately 2m deep by 3m wide) and it is a key feature in the existing landscape that will be retained and enhanced as an east-west valley. This feature would form a key component of the surface water drainage strategy as well as provide an important amenity for the Campus staff and the local community. The channel would be opened up to incorporate new planting, footpaths and recreational spaces (seating, informal play) connecting to the wider green network within the development. The valley flows from the eastern edge of the site curving into the common. Adequate room is provided to incorporate tree and shrub planting. The space is safeguarded by the separation of Dev. Areas 1 and 3 and PP3 identifies it as natural and semi-natural space. The valley is referred to in DP 10.2.

#### *Communal Gardens*

- 13.36 The masterplan envisages a series of communal gardens which would be spaces for collaboration and activity, wildlife gardens, food growing, seating areas and arts projects all with a focus on bringing the community together. The DAS confirms that the gardens would form part of the green corridor network of 'outdoor rooms' for a variety of uses from quiet enjoyment of the outdoors to larger informal sports activities. The approach to these spaces is to keep them informal and fulfil the dual functions of amenity and biodiversity. PP3 identifies the approximate location of the green corridors. DP10.2 states within Dev. Area 3 the central green corridor will have an average width of 40m.

#### *Integrating the A1301*

- 13.37 The A1301 is a two-lane 50mph road that bisects the two sides of the proposed development. It provides the primary access into the existing Campus and would provide access to the proposed Expansion Land. It has a vehicle-dominated highway character and its proposed indicative treatment has been the subject of extensive scrutiny by officers and the Cambridgeshire Design Panel. This is because it would run through the middle of the expanded Campus. People

working on either side of the A1301 would need to move easily and safely across it and the DAS provides a visual study of how this might be experienced.

13.38 The Highway Improvements Parameter Plan (PP5) shows the illustrative proposals for the A1301, along with the proposed land within which the A1301 improvements would be made. The transport interventions as well as urban design and public realm improvements seek to change the character of the road and influence a change in driver behaviour to facilitate a reduced traffic speed. DP 15.1 provides a framework for the following key indicative interventions to include:

- Narrowing of the carriageway along the A1301.
- Use of roundabouts to provide access into the site and serve as a visual cue for reducing vehicle speeds with the aim of having the signed speed limit changed from 50mph to 30mph.
- Focus on delivering a more pedestrian friendly and integrated character in the section of the road between the two roundabouts.
- Provision of a wide signal controlled at-grade crossing or a pedestrian subway in line with the key desire line between the two sides of the Campus extending from the Sanger Institute café, along the retained historic lodge and into the expansion site main plaza.
- Use of high-quality materials for the crossing points.
- Introduction of a footway and cycleway along the A1301.
- Removing the existing wooden perimeter fencing along the A1301 and thinning out of the vegetation in order to expose views into the Campus, both existing and new.
- Introduction of buildings along the A1301 in order to have a noticeable built presence along it and allowing glimpses of active uses on the ground floors. Setbacks from the carriageway are minimised to between 7m – 10m.
- An intended re- alignment of the A1301 at the northern roundabout to introduce buildings and visual focus for drivers heading north on the A1301.

#### *Supporting Plans*

13.39 To supplement the PP's several indicative plans have been submitted which, although not for approval, give key background or supporting context. These include a Composite PP (a combination of the PP's layered); an Indicative Early Landscape Works Plan; Existing and Proposed Indicative Topography Plans; and an Illustrative Masterplan. The Masterplan is not for approval. It is illustrative and represents one way in which the scheme, using the PP's submitted, could be realised. The Masterplan provides comfort that the PP's can work and achieve the aims set within policy.

#### *Objections*

13.40 Numerous third party objections have been raised in relation to the PP's and masterplan, including that the footprint is too large, that the residential fingers of Dev. Area 3 should be recessed behind existing landscaping and that the heights, even following the removal of the 20m PP height, are too great. In particular Hinxton PC note that their village mainly consists of two storey domestic houses of under 8m except for the Church of St Mary and St John, the tower of which has been measured as 20m. Hinxton PC consider that the massive scale of the proposed buildings would greatly diminish the existing village.

#### *Officer Response*

- 13.41 Officers do not consider the site to be over-developed or that the building heights would be in any way out of keeping with those that one would expect on a science campus or a residential scheme. The existing BIC building, one of the more recent buildings on the site, is 3 storeys high (14.5m). Proposed 16m high buildings which incorporate plant within this parameter are therefore akin to those on the existing Campus. The layout is also generous in its allocation of open space. In terms of footprint, any reduction of this, for example moving Dev. Areas 1 or 3 further away from the A1301, would likely result in a need to increase building heights to compensate. If the CfG and the amount of employment floorspace and homes are accepted, then removing swathes of development footprint is not an option.
- 13.42 In both residential and commercial areas, a diversity in roof form is sought and the height parameters have been set to allow for interest to be created. The 16m buildings are located away from the visual sphere of people living within Hinxtton, whereas the residential fingers extending into Dev. Area 3 are significantly set away from the A1301 by a tract of retained open land in-between which would be a hedgerow and planting adjacent to the A1301 and further into the site, structural edge planting along the western and northern boundaries. From properties in Hinxtton, officers are of the view that the scheme is sufficiently sensitive to visual amenity. For users of the A1301, including local residents, there would be a significant change in character from rural towards urban. The design of buildings and spaces onto the A1301 can be suitably controlled to ensure they are of a high quality but ultimately development onto the road and onto the rising and open agricultural Expansion Land to the east raises issues of landscape harm, which cannot be fully mitigated (either with landscaping or underground parking) and which are discussed later in this assessment.

#### *Quality Panel*

- 13.43 The application has also been presented on two occasions to the Cambridgeshire Quality Panel, on 4 June 2018 and 8 Oct 2018 (see appendix P). As part of the Panel's initial considerations, it welcomed the inclusion of housing within the employment area and the fact that the applicant is moving away from a science park campus typology where housing is not integrated. However, the Panel provided 12 points for further consideration, including as a priority an exploration of options for crossing the A1301. These were addressed in the subsequent 8 Oct 2018 presentation where the Panel supported the principle of an at-grade crossing. This was considered a good strategy with the inclusion of a second northern access roundabout with a group of buildings close by, to help reduce speeds.
- 13.44 The Oct 2018 meeting also supported a reduced size of the common to provide a more legible and animated space. However, concerns were raised about the massing of the buildings and how they would be seen from outside the site, especially from the other side of the valley to the west. The Panel suggested the applicant look at the coloration of the buildings and early landscape planting. Officers note that the former would be controlled through RM's and the Design Guide, the latter is to be controlled through PP3 and DP 13.2.
- 13.45 The Oct 2018 Panel also suggested other points for further consideration, including that the masterplan should include connectivity options to NUGC. The applicant has subsequently committed to the allowance of a link across the A11 at or near to Tichbault Road in order to provide for this should NUGC come forward. This is included in the HoT's. The remaining matters raised by the Panel

are to be covered as part of the evolution of the design through RM's and a Design Guide or are dealt with in other sections of this report such as on matters of climate change and community.

#### *Officer Conclusions on Design and Layout*

- 13.46 The PP's and DP's submitted have been developed in collaboration with SCDC and County Council officers throughout the pre-application and formal application process. Whilst not an approval document, the Masterplan has been robustly tested and has emerged through considerable consultation with officers and wider stakeholders. The Urban Design Officer has sought clarifications and modifications to the proposal. These have been addressed fully by the applicant including with the submission of a revised Development Specification in April 2019. The Council's Urban Design Officer lends her support to the scheme and summarises that the illustrative masterplan and information contained in the DAS shows how a development of a size and nature proposed may be brought forward and that the proposed layout demonstrates an acceptable application of established urban design and placemaking principles and promises a high-quality public realm.
- 13.47 Officers are of the view that this is not a scheme which would be passive in terms of its relationship to its external environment. It would be unlike other science parks such as at Granta and Babraham which are significantly landscaped around their edges. Its presence would be of a living and working science community that is open to its surroundings and to the A1301. If the vision is *'to build on the scientific foundations of the campus to become the international centre for scientific, business, cultural and educational activities emanating from Genomes and Biodata'* then the masterplan successfully delivers this in an open and transparent manner and it is to be celebrated
- 13.48 In conclusion, officers consider that the PP's and DP's provide a sound basis from which to develop a Design Guide for the application. The Design Guide would help bridge the gap between the broad parameters proposed and the detailed design stage and should provide confidence for third parties and members that a high-quality scheme would be delivered. Subject to these provisions, the proposal accords with policies HQ/1 and HQ/2 of the LP.

#### Open Space and Recreation

- 13.49 Policy SC/7 requires all housing developments to contribute towards outdoor play space (including children's play space, formal outdoor sports facilities) and informal open space in accordance with the following minimum standards.
- Outdoor sports provision – 1.6 ha per 1,000 people;
  - Open space – 1.2 ha per 1,000 people – consisting of:
    - Formal children's play space – 0.4 ha per 1,000 people;
    - Informal children's play space – 0.4 ha per 1,000 people; and
    - Informal open space – 0.4 ha per 1,000 people.
  - Allotments and community orchards – 0.4 ha per 1,000 people.
- 13.50 There is no equivalent standard for business parks, albeit policy E/10 envisages the need for shared social facilities for leisure, eating and social hubs in order to develop the social milieu of business parks.

13.51 Based on the anticipated residential population of 3,021, this would amount to an overall need for 9.66Ha of open space comprising:

- 4.83Ha of outdoor sports provision
- 3.63Ha of open space provision
- 1.2Ha of allotments and community orchards.

13.52 The Green Infrastructure Parameter Plan PP3 identifies strategic areas of natural and semi-natural space and a common totalling 16.3Ha, which is significantly higher than the overall open space requirement of 9.66Ha. Within the Expansion Land, the 16.3Ha of open space is focused around the valley and the common. Within the existing Campus the proposed open space includes an area of car parking associated with the conference centre which is to be reconfigured to allow for the green infrastructure associated with the existing Campus (including its 6Ha wetlands nature reserve) to visually connect and provide pedestrian and cycle links across to the proposed common.

13.53 In addition to the 16.3Ha, spaces are set aside on PP3 for retained and enhanced areas of vegetation (railway cuttings) and a bunded buffer zone which would be planted with a woodland and calcareous grassland along the eastern side of the Expansion Land. The public would be allowed access through this. To the west and north of the Expansion Land, arable fields are retained within which new hedgerows and pedestrian and cycle links would be provided. A rectangular area of land for outdoor sports or semi-natural open space is also shown on PP3 opposite New Road, which could accommodate playing fields. An area for allotments and community orchards – the communal gardens - is anticipated to be provided within the central green corridor as shown on PP3. Furthermore, and in addition to the 16.3 Ha, amenity space (such as play space and informal open space) would be provided within the development areas.

13.54 The precise location and quantum of open space and play space is to be defined as part of the DAB's and would also be set out as part of RM's applications which would reflect the mix of housing coming forward. The open spaces would be subject to a proposed phasing condition to ensure that they are provided in a timely manner to meet the needs of residents and future employees. The S106 would ensure appropriate management of the open spaces and provision to at least the adopted standards. The HoT's include a commitment by the applicant to provide one full size (106m x 70m) 3G all-weather pitch to Sport England standards and one locally equipped area of play (LEAP) no later than occupation of the 50th dwelling in accordance with advice received from the SCDC Sustainable Communities Team and Sport England. Overall, the level of open space provision would significantly exceed the policy requirements of SC/7 and would provide the living and working community with a range of open spaces to meet their needs.

#### *Indoor Sports*

13.55 There is no specific LP policy which sets a standard for indoor sports provision. Policy SC/7 advises reference to the Council's Indoor Sports Facility Strategy 2015-2031). Sport England advise that from the estimated population, the level of demand does not justify new strategic facilities and that the demand for indoor sports hall space can be met by the proposed community centre, provided it is designed to allow provision of a single badminton court (secured within the community facility HoT's).

- 13.56 Sport England also recognise that additional facilities are likely to be provided to meet the needs of the new community, with a possible emphasis on health and fitness. As discussed earlier in this report, the proposed supporting uses allow for the provision of 4,000 sq.m towards a fitness centre (the existing gym on Campus is fully subscribed). This provision would be beyond any need arising solely from the housing. It would be accessible to future residents and to the wider public as set out in the Outline Facilities Access Statement submitted with the application.
- 13.57 Officers are of the view that the provision to meet indoor sports demand arising from the application would be met.

### **Landscape and Visual Impact**

13.58 LP policies NH/2, HQ/1, SC/9, CC/6 and NH/6 are relevant to the landscape and visual impacts associated with the application. Together they seek to: permit development only where it respects and retains or enhances the local character and distinctiveness of the local landscape and its National Character Area; ensure development preserves or enhances the character of the local urban and rural area and responds to its context in the wider landscape; ensure no unacceptable adverse lighting impact on the surrounding countryside; ensure construction spoil is used to take account of landscape character and to avoid the creation of features alien to the topography; and ensure development contributes to the green infrastructure network within the District. The District Design Guide SPD (2010) and Landscape in New Developments SPD (2010) provide additional landscaping guidance. Paras. 127 and 170 of the NPPF (2018) are relevant.

13.59 Para. 127 states:

*'Planning policies and decisions should ensure that developments:*

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);...*

Para. 170 states:

*'170. Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;...*

13.60 The site has no statutory landscape designation such as an AONB or National Park and does not affect any statutory landscape designations nearby. Most of

the site falls within the lowland village chalklands landscape character type, as identified by Landscape East in Landscape Character Typology for the East of England. This comprises arable land which, on the Expansion Land, gently rises upwards some 23m from the A1301 at the north western corner of the site towards the A11 in the north eastern corner of the site.

- 13.61 Beyond the site and to the north, the rolling chalk landscape continues, with the arable land interspersed with hedgerow, copses and views of the landscaped avenue approach to Hinxton Grange (Grade II listed). To the east, and in the approximate location of the proposed NUGC, the land rises above the A11 to the chalk hills which are largely unsettled. The ridgeline here is largely open, with the topography accommodating low hedges and sparse tree cover except for a few prominent small hilltop copses. To the south and to the west is the existing Campus, which is largely recessive to the A1301 and set within a mature landscape river valley context typical of the area. Hinxton Hall is set within this lower landscape context, with the church spires of Hinxton and Ickleton nearby penetrating the upper tree canopies of these settlements and providing focal points in the valley floor.
- 13.62 The ES is accompanied by a Landscape and Visual Impact Assessment (LVIA), which assesses a worst-case scenario in terms of landscape impact. This assesses the effect of the development on the landscape and the people who view that landscape. It is informed by a combination of the PP's, the Early Landscape Works Plan, the Development Specification including DP's and the Illustrative Masterplan. Also relevant is chapter 11 of the ES concerning Light Pollution, which recognises the Expansion Land is predominately located within a relatively dark area with a very low brightness. It contains an Outline Lighting Strategy and baseline night-time photography within its appendix.
- 13.63 The LVIA considers impacts within 3km of the application site boundary during construction (estimated start in 2020), on completion (2031) and 15 years post-completion (2046) and includes a series of visualisations from 18 separate viewpoints which show the location, massing and visibility of the proposed development. The viewpoints are agreed by the Council's Landscape Officer and are sufficient to assess the likely landscape impacts that would arise from the scheme.
- 13.64 The visualisations include a series of existing photographed views which are reproduced and overlaid with the proposed parameters showing the sought maximum height(s) extruding from the proposed maximum footprint parameter. The same visualisation process is carried out for the proposed masterplan. Some of the visualisations include proposals without proposed landscaping and with landscaping at years 2031 and 2046. The visualisations cover the winter months when most trees would be without leaves and when the proposed development would be most visible.
- 13.65 Following the amendments made in April 2019, which removed the upper 20m height parameter and reduced the 16m height parameter envelope, the visualisations were revised and an addendum to the LVIA section of the ES was issued. In addition, and in response to third party objections, three additional viewpoints from Stud Farm, Hanley Hill and a further visualisation from Coploe Hill were submitted. The applicant's assessment of the landscape and visual effects of the development are set out in the addendum and are summarised in their ES Non-Technical summary (April) attached as appendix Q to this report.

13.66 Amongst other impacts, the LVIA finds that there would be one significant effect on landscape character in the long-term operational phase due to the change in character of the Site 'from a large scale open arable field devoid of diversity or visual interest, to a developed site with new employment buildings, community facilities, residential buildings, public open space, farmland including new hedgerows, wooded areas, groups of trees and grassland' which would comprise a mixture of adverse and beneficial changes to character (an increase in built development and lighting, but an improved condition of retained landscape features, additional landscape features and improved habitat diversity).

13.67 The following DP's put forward by the applicant seek to mitigate the landscape and visual impacts of the development:

- The stepping down in height of buildings and variation / modulation of the building line where this would help minimise landscape visual impact along the development edge (DP7.6)
- Massing to avoid creating the appearance of contiguous blocks of development in views to, from and within the site. For example, through the use of articulated rooflines. (DP7.7)
- Rooftop plant to be integrated into the design of buildings (DP8.1)
- Early delivery of structural edge planting as per PP3 to take the form of informally but closely spaced copses of trees as a layer of green to soften the built edge in the manner of historic linear settlement and woodland patterns seen in the area and the use of green and brown roofs where feasible (DP13.2)

#### *Objections*

13.68 The application has attracted a significant amount of third-party objection concerning the landscape impacts associated with the scheme. The issues stem from the proposed footprint of the development, its associated heights and the relatively open, rising and attractive rolling chalkland character of the Expansion Land. The amendments to remove the maximum 20m PP height and to reduce the envelope of the 16m PP height are viewed as immaterial. Third parties consider the scheme would result in adverse visual and landscape character harm contrary to adopted policy. Numerous concerns have been raised regarding the extent of viewpoints and the reliability of the LVIA assessment method.

13.69 The lack of a cumulative LVIA with the AgriTech site and/or NUGC has also been raised, however, in terms of this and in accordance with the EIA Regulations 2017 and for the reasons as set out in para. 6.11 onwards, the Council has not sought a cumulative LVIA.

#### *Officer Conclusions on Landscape and Visual Impact*

13.70 A detailed consultation response objecting to the application on the grounds of landscape and visual impact harm has been provided by the Council's appointed external landscape consultants Huskisson Brown Associates (HBA). HBA represented the Council in its pursuance of the landscape reason for refusal for the AgriTech appeal on land adjacent to the Expansion Land, in the summer of this year.

13.71 HBA have been involved throughout the pre-application and application process associated with the application. They have been part of the iterative testing of the visual impacts including the review of the visualisations. HBA have reviewed the

LVIA in full knowledge of the mitigation put forward by the applicant. Overall, HBA consider that the proposal would be very harmful to the local landscape character and visual environment. They state that the development contains built form of such scale and height that it could not be successfully mitigated over time and that the project has not been sufficiently strongly landscape led, but do not suggest that this could overcome the fundamental landscape and visual issues arising from the proposal.

- 13.72 In terms of the treatment of the A1301 corridor through the site, HBA raise a concern with the effect of the quality of the spaces to be created adjacent to it and its successful incorporation / integration into the Campus. HBA consider that the applicant has wrongly assessed the visual effects of this aspect of the proposal which it is considered should have been treated on a far more precautionary basis as a significant adverse effect.
- 13.73 HBA recognise that if Wellcome retains control of the overall site and implement an appropriate strategy for the management of the open spaces and the landscape structure for the long term, a high standard of landscape could be created. However, it would be one that would not be in character with the locality nor would it offset the harmful effects of the built form on the character and appearance of the area. HBA are of the view that the proposal would introduce a substantial block of new urban development onto an area of gently rising ground in a currently very open arable, strongly rural landscape. This would be set within a framework of predominantly new landscape features that in themselves would further alter the character of the open landscape setting whilst not masking the resultant visual intrusion of the development. The reduction in height and the changed distribution in the 16m maximum height have had minimal influence on HBA's appraisal of the scheme.
- 13.74 Officers agree with HBA's assessment of harm and share the principal concerns of third parties. Views along the A1301 close to the site would show a prominent development edge adjacent to Dev. Area 1. Views from further afield, such as from Coploe Hill, would show the development rising-up the gentle rolling chalkland hills out of the verdant Cam river valley. This part of the rising chalkland landscape is sparsely developed, dark at night and provides a foil to the attractive setting of the villages which sit alongside the lower edge of the Cam (Gt. Chesterford, Ickleton, Hinxton, Duxford). Development in this part of the local landscape is mainly confined to the lower chalklands and the existing Campus sits comfortably within it, with the church spires in Hinxton and Ickleton visually rising above the tree canopy. The scheme and particularly the development of the Expansion Land would signify a marked change in the presence of the Campus within the landscape (by day and by night), to one of visual prominence. Notwithstanding that the development would be likely to demonstrate a high quality of design and landscape delivery, harmful effects would arise in respect of landscape character and visual amenity contrary to LP policies HQ/1, NH/2 and SC/9 and contrary to paras. 127 and 170 of the NPPF.
- 13.75 Notwithstanding these concerns, officers seek to impose conditions relating to advance planting, long term management of landscaping and ecology (LEMP), lighting, phasing of planting and landform / topography. In addition, the proposed Design Guide would influence the design of the open spaces and landscaping within them in preparation for RM's applications. The Design Guide would build upon the DP's (particularly sections 7, 8, 10, 12 and 13) set out in the Development Specification in terms of seeking to minimise landscape and visual impacts.

- 13.76 The harm identified by HBA – the Council's appointed landscape advisor – will need to be weighed in the planning balance against the benefits arising from the proposal, including those set out in the CfG.

### **Cultural Heritage**

- 14.1 The statutory considerations as set out in section 66(1) and section 72(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, are matters to which the determining authority must give great weight to when considering schemes which have the potential to impact on heritage assets.
- 14.2 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the legislative context for development that affects the setting of listed buildings:
- 14.3 *'In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possess.'*
- 14.4 Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it a statutory duty for a local planning authority, in the exercise of its planning powers with respect to any buildings or other land within a Conservation Area, to:
- 14.5 *'Pay special attention to the desirability of preserving or enhancing the character or appearance of that area'*
- 14.6 The Court of Appeal has determined that, in order to give effect to the statutory duties under section 72 (1) and section 66 (1), in respect of development proposed to be carried out within the setting of, or which may impact upon a listed building, or in a conservation area, a decision-maker must a) in respect of listed buildings accord considerable importance and weight to the 'desirability of preserving the listed building, or its setting' and b) in respect of a conservation area give a high priority to the objective of 'preserving or enhancing the character or appearance of the area', when weighing this factor in the balance with other 'material considerations' which have not been given this special statutory status.
- 14.7 Officers have had regard to the statutory duties set out in section 66(1) and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and in considering this application have given considerable weight and importance to the desirability of preserving the setting of the affected listed buildings and to preserving or enhancing the character and appearance of the affected conservation areas, both sets of which have been detailed in the section entitled 'Built Heritage Assets' below.
- 14.8 Furthermore, officers have taken into account, as a material consideration, the policy guidance in paragraphs 193-196 of the NPPF. Para. 193 of the NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, "great weight" should be given to the asset's conservation (meaning the more important the asset, the greater the weight should be). Para. 194 makes it clear that any harm to, or loss of significance of a heritage asset should require clear and convincing justification. Para. 196 of the NPPF states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, such harm should be weighed

against the public benefits of the proposal, including its optimum viable use. Para. 200 makes it clear that local planning authorities need to look for opportunities for new development within Conservation Areas, World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals which make a positive contribution to the asset or better reveals its significance should be treated favourably.

- 14.9 In respect of non-designated heritage assets para. 197 of the NPPF states that the effect that a proposal will have on such an asset should be taken into account in determining the application, and in considering such applications a balanced judgment is required having regards to the scale of any harm or loss and the significance of the heritage asset.
- 14.10 The Council's LP policy NH/14 'Heritage Assets' sets out that development proposals will be supported when: a) they sustain and enhance the special character and distinctiveness of the District's historic environment including its villages and countryside and its building traditions and details; and b) they create new high quality environments with a strong sense of place by responding to local heritage character including in innovatory ways. The supporting text to policy NH/14 states at para 6.49 that the conservation of heritage assets does not prevent all change but requires it to be managed in a way which does not compromise heritage significance and exploits opportunities for enhancement.
- 14.11 Policy HQ/1 'Design Principles' seeks to ensure proposals conserve or enhance the character of the local urban and rural area and respond to its context in the wider landscape, including historical assets and their setting. Policy SC/9 is engaged in relation to lighting and its impact on the surrounding countryside.

#### Built Heritage Assets

- 14.12 All three nearby villages of Hinxton, Ickleton and Great Chesterford have designated conservation areas. The closest of these is Hinxton Conservation Area, which lies to the west of the Expansion Land and incorporates most of the historic village of Hinxton. It extends south into the existing Campus (excluding Southfield) and includes the northernmost elements of the existing Campus (Hinxton Hall, conference centre parking, Sulston building and former gatehouse close to the entrance roundabout). It extends as far as the A1301 to the east where it cuts around the Church of St Mary and St John in Hinxton and extends west as far as the alignment of the river Cam. To the north it stops at the beginning of North End Road.
- 14.13 Within Hinxton and on the existing Campus is the Grade II\* Hinxton Hall and stables. These lie just outside the application site. They are currently in use as part of the conference centre facilities. The Hall contains accommodation on its upper floors. Within the grounds of Hinxton Hall are East Lodge, a curtilage listed structure and a Grade II listed lodge (North Lodge).
- 14.14 Further to the north, Hinxton contains numerous other listed buildings including but not limited to the Church of St Mary and St John (Grade II\*) which is set back from and on the eastern side of the High Street, the Old Manor House (Grade II\*) and the Oak House (Grade II\*). Ickleton similarly contains many listed buildings, most notably the Church St Mary Magdalen (Grade I). The spires of both churches are prominent in key landscape views from within the site and from outside the site across the cam valley floor from elevated locations.

- 14.15 There are two scheduled monuments within 1km of the site: the Romano-British Settlement site west of Hinxtion, and the Roman Fort, Roman Town and Roman and Anglo-Saxon Cemeteries at Great Chesterford.
- 14.16 Hinxtion Grange, a Grade II listed manor house, lies to the north of the site and is flanked by associated designed parkland on its western side, together with a formal tree avenue linking to the A1301. To the south of Hinxtion Grange on its southern access is a World War II pill box (non-designated heritage asset). Further north is Pampisford Hall Park and Gardens (Grade II\* listed, incorporating Grade II\* listed Pampisford Hall), and this is the nearest historic Registered Park and Garden. A post medieval historic milestone (record OA357) lies close to the existing Campus entrance on the A1301.
- 14.17 A map is attached at appendix C which shows heritage constraints within and near to the application site.
- 14.18 The ES (chapter 8) Cultural Heritage includes a Heritage Statement at appendix 8.1 to the ES undertaken by the Heritage Collective. The applicant states that the development has been designed to seek to avoid significant adverse effects through careful planning, siting, access, layout, and the scale of buildings. These design elements comprise:
- The set back of built development from the village of Hinxtion and listed buildings, notably Hinxtion Hall, Church of St Mary and St John the Evangelist and Hinxtion Grange.
  - Retention of Eastern Lodge.
  - Inclusion of structural landscape planting on the edge of Dev. Area 3 to soften effects of the development on the surrounding landscape.
  - Retention of the mature tree planting surrounding Hinxtion Hall and selective thinning within the Campus Land.
  - Revision of the existing conference car park to an area of landscape to improve upon the existing setting of Hinxtion Hall.
  - Restriction of building heights and incorporation of green open spaces through the establishment of the extent of built development on the Expansion Land.
- 14.19 The ES finds that upon completion of the development that the majority of the heritage effects would be neutral, however, it concludes there would be three elements or aspects of less than substantial harm – on Hinxtion Hall, Hinxtion Conservation Area and the Church of St Mary and St John the Evangelist in Hinxtion (see table 8.6 in the ES). The Heritage Statement explains that against para 196 of the NPPF the effects on those assets would result in some slight (less than substantial) harm, all of which would 'be at the lower end of less than substantial harm' range.

#### *Heritage Significance*

- 14.20 The ES, chapter 8, Cultural Heritage, sets out at table 8.5 the significance of all relevant heritage assets. The following key assets and their significance are set out below:

#### *Hinxtion Hall (Grade II\*)*

- 14.21 Hinxtion Hall is of interest as an 18th century country house with later high quality 19th century additions. Internally several important decorative features remain. The surviving decorative interiors are of a very high quality. There are some

views between the Expansion Land and Hinxton Hall from the upper floors of the listed building, looking north east. These views are currently to open countryside (the Expansion Land) which inform the historic interest of the Hall as a former country house. The fields are beyond the mature tree planting (a large extent of which is evergreen) within the grounds of Hinxton Hall which form part of its rural country house character. The setting of the Hall to the south is defined by a large area of landscaped parkland which leads to a wetlands area and a significant area of conference centre parking closer to the A1301. To the north of the Hall, its original access road meanders through a landscaped parkland setting until it reaches a gated entrance from New Road opposite the main High Street in Hinxton.

#### *Hinxton Conservation Area*

- 14.22 Hinxton was an established village as early as 1086. This has resulted in a diverse built form within the village as buildings were improved and replaced over many centuries. The predominant architecture of the village is of timber framed buildings, with more recent brick buildings and modern infill development also apparent.
- 14.23 South of the main village of Hinxton, the Hinxton Hall Estate contributes to the architectural interest of the conservation area. The collection of buildings in the Campus Land including the Hall, Stables, Game Lodge and North and East Lodges are all within the conservation area boundary and contribute to the diverse architectural character of the area and form an important group of buildings. The older buildings within the village contribute to its historic character, as do the farmsteads located on the perimeters.
- 14.24 Infill development has taken place within the village and the introduction of the Wellcome Genome Campus, associated infrastructure and the introduction of the A11 not far east has changed what would have been a wholly rural setting to the village. The surrounding land that remains in arable use (the Expansion Land) makes some contribution to the setting of the conservation area due to its non-developed state and role in indicating the historic origins of the village.

#### *Church of St Mary and St John the Evangelist (Grade II\*) Hinxton*

- 14.25 Located within the centre of the village of Hinxton set back from the High Street on the eastern side of the village, the church is located within a churchyard, surrounded to the north and south by gardens and demarcated by the boundary wall.
- 14.26 The earliest parts of the building are the nave, chancel and west tower which are 13th century in origin. Later additions include the rebuilt 14th century south chapel and porch. There were repairs and restorations in the 17th and 19th century to the building. The building is of high architectural value as a result of its materiality, design and decorative features, both externally and internally.
- 14.27 There is some illustrative interest derived from the 19th century "restoration" of the building which has links to the Gothic Revival. This historic building is an important landmark feature within the village and surrounding area denoting a historic settlement. The Expansion Land contributes to the setting of the church as undeveloped agricultural land which forms part of the rural setting of the building. Views of the church and its spire from the site form part of its setting although the views are incidental rather than designed.

- 14.28 There is limited visibility to the Campus Land due to the intervening built form. This does not contribute to the setting of this listed building.

#### *Ickleton Conservation Area*

- 14.29 This conservation area has interest in the diversity of the built form and architectural styles present. There is a linear characteristic to the settlement which culminates around St Mary Magdalene Church where a village green remains. The former agricultural character of the village is reflected by Mowbray's Farmhouse and associated outbuildings (now in separate residential uses) located nearby to the green and near to the church. Originally located on the Icknield Way where it crossed the River Cam, Ickleton is likely to have been inhabited from the pre-historic period, but the current settlement dates from the late Saxon era.
- 14.30 The site does not contribute to the setting of Ickleton Conservation Area in any meaningful way. The boundaries of this heritage asset have been drawn around the historic core of the village, and while the undeveloped land surrounding it, makes a small contribution to its setting by allowing views into and out of the historic village, and forming part of its rural surrounds, there is limited visibility between the Campus Land or Expansion Land and anywhere where the architectural, historic, artistic and archaeological interest of the conservation area can be appreciated.

#### *Church of St Mary Magdalen (Grade I) Ickleton*

- 14.31 Partially dating to the 11th century with 13th, 14th, 15th, 18th, 19th and 20th century alterations and repairs this building is a mixture of styles representing its phased development. The wall paintings are evidence of the theological traditions in the medieval period and the monuments and tombs serve as reminders of local residents. The significance of the church is best experienced from the churchyard and village green where the architectural and historic interest of the church can be experienced.
- 14.32 Due to the landmark presence of the building its spire can be seen in incidental long distance views from the surrounding area, including from the car-park of the Existing Campus but this is not a designed view/ vista and is incidental to the interest of the building.

#### *Objections*

- 14.33 Historic England is satisfied that the proposals would not cause harm to the setting of Hinxton Hall or the Church of St John and St Mary, Hinxton (both Grade II\*) nor to the substantial number of designated heritage assets located within 1.5km radius of the application site and no objection on heritage grounds is raised.
- 14.34 Third-party objections have been received regarding heritage impact, including from Essex County Council, the Ickleton Society and Ickleton PC (in relation to rat-running). The officer assessment of these concerns is discussed below.

#### *Officer Conclusions on Cultural Heritage*

- 14.35 The Council's Historic Buildings Officer has reviewed the ES chapter on Cultural Heritage and associated Heritage Statement by the Heritage Collective together with other sections of the ES including the LVIA visualisations and chapters 10,

11 and 14 of the ES (LVIA, Light Pollution and Noise and Vibration). The visualisations include views from Hinxtion Hall and from the Church of St Mary and St John the Evangelist in Hinxtion looking east towards the Expansion Land. The visualisations have been further assessed following revisions to the PP's removing the maximum PP 20m height and reducing the extent of the 16m PP height envelope.

- 14.36 A strong objection is raised by the Council's Historic Buildings Officer who has advised that the proposed development primarily affects the setting of the built heritage assets of Hinxtion Conservation Area, Hinxtion Parish Church of St Mary & St John the Evangelist (Grade II\*), Ickleton Parish Church of St Mary Magdalen (Grade I), Ickleton Conservation Area, and to a lower degree Hinxtion Hall (Grade II\*) with indirect rather than direct effects. The assessment and management of views is part of the consideration of the significance of heritage assets. In this case there are views which contribute to the significance of heritage assets and the ability to appreciate that significance, and which will be altered by the proposed development in a way which harms their significance and detracts from the ability to appreciate that significance.
- 14.37 In terms of setting and as set out in the LVIA section of this report, there are several areas of high ground from which the historic settlement pattern along the valley of the River Cam can be appreciated. Ickleton, Hinxtion, and villages onward to Cambridge are linked by the river. Ickleton and Hinxtion are nestled amongst trees in the valley, framed by rising ground in an open, arable, strongly rural landscape. The spires of St Mary Magdalen Ickleton, and St Mary & St John Hinxtion, are focal points and important features within their conservation areas and wider landscape. There is additional value in the grouping of these heritage assets.
- 14.38 The Historic Buildings Officer has provided a comprehensive assessment of the LVIA visualisations, which show a worst-case impact from key viewpoints around the site. These are set out below:

#### *Viewpoints*

- 14.39 As set out in the landscape assessment section of this report, the LVIA has assessed 18 different viewpoints in association with the application. In terms of heritage impact, officers consider viewpoints 1, 2, 5, 7, 11 and 18 to be pertinent.
- 14.40 Viewpoint 1 from Hinxtion Hall, demonstrates that the parameter massing would have no, or very limited, visibility from Hinxtion Hall or in key views towards the Hall. The 'wider rural context' of Hinxtion Hall would be diminished, but it is accepted that this will have minimal effect on how the listed building is experienced. There are, however, concerns about the impact of additional light affecting the setting of Hinxtion Hall, see below.
- 14.41 Viewpoint 2 is taken from a public right of way adjacent to the Church of St Mary and St John the Evangelist (Grade II\*) Hinxtion and adjacent to Hinxtion Conservation Area. The view is looking east across the Expansion Land mainly towards Dev. Area 3 and shows the 11m parameter extending upwards and above the higher chalk ridge line behind. Whilst arable land would sit between the edge of Dev. Area 3 and the immediate curtilage of the Church, its agricultural setting would nonetheless be diminished, mitigated mainly by the structural edge landscaping and raised hedgerow line shown adjacent to the A1301.

- 14.42 Viewpoint 5 demonstrates the visual impact that the Expansion Land development will have as perceived from the heart of the Hinxtton Conservation Area. Views from within the village make a particularly important contribution to the character of the village as a rural community, historically of farmsteads, emphasising the historical agricultural connection between the village and the surrounding landscape. The rising land east of Hinxtton facilitates views out to open and arable land, terminating at the distant ridgeline, within the Expansion Land. From here, the Historic Buildings Officer notes that the height, density and scale of the development is such that it will eliminate the rural character of the Expansion Land with the consequent effect on views east from the Conservation Area. The Historic Buildings Officer considers that the 1,500 new residences will have a strong urbanising impact on the setting of the Hinxtton Conservation Area, detracting from the rural setting of the small, historic village and that the proposed 'rural buffer' will be insufficient to adequately mitigate the impact of development.
- 14.43 Viewpoint 7, Coploe Hill, has also been highlighted by both the Council's landscape consultant HBA and Hinxtton PC. From this location there are long distance views over Ickleton and Hinxtton in their landscape setting, in which the development would feature prominently. The quantum, scale and siting of the development would mean that the bulk of the built environment within the view would be on the Expansion Land, overwhelming the villages, distorting the perceived settlement pattern and transferring emphasis from the church spires as focal points, causing harm to the significance of Hinxtton and Ickleton Conservation Areas, St Mary & St John (Grade II\*), and St Mary Magdalen (Grade I). There is a similar impact from viewpoint 11, which although distant at a point just outside the 3km study area, offers views towards Ickleton and Hinxtton in their historic landscape setting.
- 14.44 Viewpoint 18, closer at hand, shows St Mary & St John as a landmark feature within a valley settlement and entirely rural setting. Fig 10.18.e shows the proposed development as a swathe across the backdrop to this view; the extensive built environment forming a distant but injurious contrast to the existing rural landscape.

#### *Light*

- 14.45 Serious concerns are raised by the Historic Buildings Officer about the impact of light, both on a permanent basis once the development is complete, and during the 11 years of construction. ES Chapter 11 (Light Pollution) also finds that significance of effects to Hinxtton and Ickleton (high sensitivity) will be minor adverse to negligible but relies on the minimisation of potential lighting effects by advance landscape planting.
- 14.46 The ES lighting assessment finds that light spill could be controlled through a careful lighting scheme, but identifies that *'the Completed Development will have visual impact on direct views of the site from Hinxtton Village and Ickleton Village with respect to skyglow'*. The chapter describes that *'The Proposed Development falls within an existing area of Environmental Zone E1 where there is currently little building development and very few sources of artificial light, so any development incorporating artificial light would have an impact on the night time scene'* (4.30).
- 14.47 Night-time darkness over the land around Hinxtton is intrinsic to the rural character of the Conservation Area and also in relation to the landscape character of this part of the rising chalklands as set out in the LVIA section of this report. Skyglow, and potentially light spill, would harm the significance of Hinxtton

Conservation Area, St Mary & St John, and Hinxton Hall through further erosion of the rural setting. This would also be contrary to policy SC/9 notwithstanding the mitigation proposed and the ability to approve detailed lighting schemes.

*Overall*

- 14.48 Officers consider that the proposed Expansion Land development would cause a high degree of 'less than substantial' harm to the significance of Hinxton Conservation Area and a degree of 'less than substantial' harm to the significance of Hinxton Parish Church of St Mary & St John the Evangelist (Grade II\*), Ickleton Parish Church of St Mary Magdalen (Grade I), Ickleton Conservation Area, and to a lower degree Hinxton Hall (Grade II\*), due to inappropriate development in their setting. The range and degree of harm identified by officers is wider and more harmful than as set out within the ES. The proposal conflicts with LP policies NH/14, SC/9 and HQ/1 and as a result of this harm, to which great weight and importance is by law required to be attached, requires clear and convincing justification in accordance with para. 194 of the NPPF. In accordance with para. 196 this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 14.49 In relation to third party objections in respect of increased harm to listed buildings on the road network - particularly in Ickleton – officers do not consider that any such harm that may arise could constitute a defensible reason to object to the scheme. This is primarily because there is limited evidence of existing rat-running caused directly by the existing Campus, the applicant seeks to implement a Sustainable Transport Strategy and measures would be put in place in the event of an approval of planning permission to ensure rat-running is both monitored and that funds are available to seek to mitigate any additional rat running arising from the occupation of the scheme.
- 14.50 Notwithstanding the objection raised by the Council's Historic Buildings Officer, officers seek to impose conditions relating to advanced structural planting, alterations and phasing for the conference centre car parking area to ensure it forms part of the envisaged green infrastructure of the site and lighting. In particular, the advanced structural landscaping along the western edge of Dev. Area 3 would lessen the urbanising effects of developing the Expansion Land when perceived from Hinxton. Alterations to the conference centre car parking to remove the majority of the parking and extend the green corridor across from the existing site to the common may result in an improvement to the immediate setting of Hinxton Hall albeit the details are unknown at this stage and limited weight can be attached to this. Detailed lighting schemes as part of RM's applications would ensure light spillage is minimised. These measures are secured through conditions. In addition, the proposed Design Guide would influence the design of the buildings to ensure they are of a high quality.
- 14.51 The harm identified by the Council's Historic Buildings Officer and the conflict with LP policies NH/14, SC/9 and HQ/1 will need to be weighed in the planning balance in accordance with para. 196 of the NPPF against the public benefits arising from the proposal, including those set out in the CfG.

Archaeology

- 14.52 The effects of the proposal on cultural heritage have also been assessed in chapter 8 of the ES. Following the April 2019 amendments, in response to the County Archaeologist feedback, a replacement ES appendix 8.6 including a

detailed archaeological evaluation report was submitted. LP policies NH/14 and HQ/1 are engaged. NPPF para. 189 is relevant.

- 14.53 The ES Archaeological Assessment finds that, following the implementation of mitigation (long-term display/public presentation of the results of the archaeological field work), the residual effect of the proposal upon known and potential archaeological remains within the site would be negligible. It identifies that the proposal would secure long-term display or public presentation of the results of the archaeological field work and that this would increase public understanding of the archaeology within the site and would help to offset adverse impacts upon the below ground archaeological resource.
- 14.54 The County Archaeologist has reviewed the revised ES and advises that they can support the intention to conduct appropriate mitigation and will assist in its formulation at a suitable future stage should permission be granted.
- 14.55 In relation to the green infrastructure and the indicative masterplan, the County Archaeologist advises that these show the sinuous, roughly N-S flow of the ancient trackway found through the course of evaluation. Its persistence and integration into the masterplan is welcome and a commitment to interpretation and long-term display will make the cultural heritage relevance of this feature enter a new local landscape.

#### *Officer Conclusions on Archaeology*

- 14.56 There are no objections to this development on heritage grounds relating to archaeology. The mitigation of archaeological heritage would include the implementation of a programme of archaeological work within the Development Area in accordance with a written scheme of investigation, a post-excavation assessment and an archive report. The County Archaeologist advises that further evaluation is achievable and its results will contribute to our understanding of the hinterland of Roman Great Chesterford and the Cam Valley archaeological sites and monuments. The County Archaeologist advises a proposed condition which is set out in appendix A. In respect of archaeology, the proposed mitigation would ensure the scheme complies with policy NH/14 and para. 199 of the NPPF.

## **15.0 Transport**

- 15.1 LP policy TI/2 'Planning for Sustainable Travel' requires development to be located and designed to reduce the need to travel, particularly by car, and to promote sustainable travel appropriate to its location. It states that planning permission will only be granted for developments likely to give rise to travel demands where the site has (or will attain) sufficient integration and accessibility by walking, cycling or public and community transport.
- 15.2 LP policy TI/2 also requires developers to demonstrate adequate provision will be made to mitigate the likely impacts of the proposed development and, for larger developments, to demonstrate they have maximised opportunities for sustainable travel, and provided a Transport Assessment and Travel Plan, including a Low Emissions Strategy Statement. Travel Plans must have measurable outputs related to the Local Transport Plan and include monitoring and enforcement arrangements. The policy allows for direct improvements and S106 contributions to address transport in the wider area including across the District boundary.

- 15.3 LP policy TI/3 'Parking' advises car parking provision should be provided through a design-led approach in accordance with indicative standards. Cycle parking should be provided to at least the minimum standards. The policy requires that car parking provision takes into consideration the site location, type and mix of uses, car ownership levels, availability of local services, facilities and public transport, and highway and user safety issues, as well as ensuring appropriate parking for people with impaired mobility. It states that the Council will encourage innovative solutions to car parking, including shared spaces where the location and patterns of use permit, and incorporation of measures such as car clubs and electric charging points.
- 15.4 Section 9 of the NPPF concerns 'Promoting Sustainable Transport' and paras. 102-111 are relevant to the application. To promote sustainable transport, the NPPF (para. 102) requires *'transport to be considered from an early stage in development proposals to ensure any potential impacts can be assessed and addressed, opportunities are realised to use existing, new or changing technology and to promote walking, cycling and public transport, and that patterns of movement, streets, parking and other considerations are integral to scheme design and the making of high quality places'*.
- 15.5 The NPPF para. 84, recognises that some developments may be required in locations that are not well served by public transport. In these circumstances they should not have an unacceptable impact on local roads and should exploit opportunities to make a location more sustainable.
- 15.6 The NPPF para. 109 states that:
- 15.7 *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*
- 15.8 Chapter 12 of the ES deals with Transport and Access and includes at appendix 12.1 a Transport Assessment (TA) and at appendix 12.2 a Site-Wide Travel Plan. The applicant has provided additional information to the County Council Transport Team, including:
- Transport Assessment Additional Information (27th February 2019);
  - Transport Scoping Update (19th March 2019);
  - Transport Assessment Additional Information (22nd March 2019);
  - Updated Trip Generation and Distribution Report (26th March 2019);
  - Traffic Flow Diagrams (3rd May 2019);
  - Development without mitigation (Paramics Outputs);
  - Updated Traffic Flow Diagrams (19th May 2019);
  - Post Audit Paramics Model note (24th July 2019);
  - Updated Modelling Note (22nd August 2019).
  - Various updates of the S106 Heads of Terms
  - Updated Modelling Note (25<sup>th</sup> September 2019)

#### *Context*

- 15.9 The Wellcome Genome Campus has an existing Travel Plan (TP) which is used to monitor and manage the travel patterns of the existing Campus uses. Its principal aim is to reduce single occupancy car trips by 2020 with a range of

measures provided to support this goal. These measures include a free to use Campus bus service and free to use shuttle bus service which mainly operates between the Campus and Whittlesford Parkway railway station but which also serves Sawston. The Campus has received multiple awards for its TP including the '2014 Science and Technology Award' and 'Green Apple Earth Appeal 2014'.

15.10 The existing TP targets and survey results relating to Single Occupancy Vehicle (SOV) movements are set out by the applicant in the below table:

	2013	2014	2015	2016	2017	2018	2019	2020
<b>SOV use (surveyed)</b>	48%				43%			
<b>Targets</b>		46%	44%	42.5%	41.5%	41%	40.5%	40%

15.11 This shows that the existing 40% target for SOV was being marginally exceeded in 2017 but has reduced significantly since 2013. The County Council has obtained more up-to-date figures on SOV from Travel to Cambridgeshire which shows an existing 40.6% SOV mode share for 2018.

15.12 The applicant sets out that as part of the on-going monitoring of the existing TP, a survey of staff travel patterns was undertaken in 2017. Staff were asked to identify the main mode of travel undertaken for their journey to and from work. The results are shown below alongside the South Cambridgeshire average taken from journey to work census data.

Main Mode of Travel	South Cambridgeshire Average (2011)*	Campus Staff (2017)
Walk	7.3%	0.9%
Cycle	7.0%	6.0%
Motorbike /Scooter	0.9%	0.7%
Train	1.5%	1.5%
Bus (Local)	2.7%	0.2%
Bus (Free Campus Service)	-	32.0%
Car Driver Alone	-	43.2%
Car Driver with Child		4.5%
Car Driver Electric Vehicle		1.0%
Car Share Driver with passenger		6.4%
Total: Car Driver	75.2%	55.1%
Car Share Passenger / Dropped Off at the site	4.6%	3.4%
Taxi	0.2%	0.2%
Other (including underground)	0.6%	-
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>

\* WD703EW - Method of travel to work (Workday population)

15.13 The table shows:

- A high proportion of staff currently travel to the Campus via sustainable modes of transport such as walking (0.9%), Cycling (6%) and by bus and train (33.5%).
- Travel to work by car is lower than the figures for South Cambridgeshire at 55% compared to 75%.

15.13 In addition, the survey also revealed that the majority of survey respondents arrive at the Campus between 8:30 and 9:29 and depart between 17:00 and 17:59.

#### *Applicant Approach*

15.14 The applicant states that they seek to implement a Sustainable Transport Strategy that seeks to minimise the use of single occupancy vehicles, maximise the use of sustainable modes of transport and increase the accessibility of the site. This is primarily achieved through:

- The provision of housing on-site for Campus Related Workers;
- Improvements to local walking, cycling and bus infrastructure, as well as links to Whittlesford Parkway station; and
- A comprehensive Site-Wide Travel Plan.

15.15 Alongside these measures, the applicant specifically proposes / has agreed to:

- Gateway and speed reduction features (narrowing of lanes, introduction of roundabouts) slowing vehicles (50 to 30mph) along the A1301 and safe crossings provided to support the vision for one integrated Campus;
- Improved pedestrian / cycle connections to Hinxton via New Road;
- New shared-use footways / cycleways along sections of the A1301 including a link on the western side to the existing footway / cycleway that links to the A505 and improved links within the Campus;
- Off-site highways mitigation, including but not limited to McDonalds' roundabout and improvements to the M11/Junction 10 south bound off-slip; and
- The facilitation of access across the A11 arising from NUGC as a development requirement if the proposed NUGC allocation comes forward (officer led request).

15.15 The indicative highways improvements within the site are shown on PP5. The applicant's approach to car parking seeks to prioritise the use of multi-storey car parking. The structures for this would be located away from the centre of Dev. Area 1 towards the A11, being located to promote movement through the site by foot and to minimise on-plot car parking. A car parking ratio of 0.46 spaces per employee is proposed, which is the same as the existing Campus ratio. Provision for electric vehicle charging would also be made to encourage uptake of electric vehicles, including by Car Club operators.

15.16 A condition is proposed which seeks for a Site Wide Parking Plan for cars, coaches, buses, motorcycles and cycles to be approved. This would set parking levels for different uses and include a review mechanism to ensure the Travel Plan targets are being met.

15.17 The applicant's Transport Assessment (TA) concludes:

- The proposal would not result in an unacceptable impact on highway safety;
- The improvements to the A1301 would reduce speeds and enhance safety; and
- There would not be a severe impact on the operation of the highway network.

### *Objections*

15.18 Issues relating to traffic, transport and associated mitigation are a significant part of the overall objections. Most of the objections raise issues with existing congestion on the network, particularly queuing at McDonald's roundabout and along the A505 from the M11 to the A11 at peak hours. Parishes and local representations cite rat-running at peak hours as a key existing issue, which is backed up by traffic counts taken within the locality. Concern is expressed that rat running through the nearby local villages and its associated harmful impacts (e.g. noise, fumes, vibration, health, highway safety, damage to property), particularly in Ickleton, Duxford and Hinxton but also further afield, will substantially increase as a result of the proposal. Significant concerns are raised with the Transport Assessment (TA) submitted alongside the application and with its methodology, adequacy and extent of the mitigation. It is suggested that the use of TEMPRO for traffic growth projections is inappropriate to model SCDC adopted Local Plan allocations. Technical deficiencies in the TA are raised including by Peter Brett Associates on behalf of Grosvenor, by Essex County Council, Uttlesford DC and third parties including Hinxton PC and Ickleton PC. The Travel Plan is also

criticised for not being ambitious enough or capable of mitigating the impact of the development.

- 15.19 Most parishes and third parties consider that congestion will get worse as a result of the proposal and there is scepticism concerning the methodology and reliability of the traffic data that has fed into the TA, including from off-site impacts arising from the housing.
- 15.20 Many responses cite the need for strategic solutions to the network including suggestions to provide a dual carriageway for the A505 and providing an improvement to the M11 junction 9 to allow northbound access onto the M11 from Stumps Cross and southbound egress onto Stumps Cross from the M11. A more joined-up (cumulative) assessment process and approach to solutions across the affected parts of the highway network from strategic sites, including NUGC, AgriTech and Huawei (at the former Spicers site in Sawston) is sought. The mitigation proposed is not seen as being of benefit to local residents and neither is it seen as radical enough to alleviate existing and future problems on the network.

#### *Officer Assessment on Transport*

- 15.21 Cambridgeshire County Council Transport Team initially raised a holding objection to the application for the following reasons:
- Issues primarily concerning the development mix, trip generation, internalisation of trips, accident data and mode share; and
  - Issues concerning the site strategy, off-site improvements and parameter plans including the provision of Stage One Road Safety Audits for each of the proposed improvements to the highway network.
- 15.22 Highways England, the highway authority for the strategic road network, also initially raised a holding objection on the basis that they were still reviewing the TA. They provided a technical note from their transport consultant AECOM outlining issues.
- 15.23 Following extensive discussions with the applicant, County Transport officers advise that technical issues have been addressed such that a sound conclusion of the development impacts can be drawn. Subject to the delivery of appropriate mitigation to address these impacts, they have no objection to the proposal. At the time of writing this report, there is an outstanding holding objection from Highways England. Officers will report any further response from Highways England on the Update sheet.
- 15.24 The County Transport team has reached the following conclusions on the TA.

#### *Impact Assessment*

Trip Rates: Following the provision of additional information, County approves the trip rates assumed for the respective land uses proposed.

Distribution and Flows: Following the provision of additional information, County approves the assumptions relating to the distribution of traffic associated with the development. Distribution of trips was determined utilising existing staff postcodes for commercial trips and Census 2011 for residential trips. Modes shares for other land uses were subject to discussion and agreement with County.

Paramics: The Paramics microsimulation model was independently audited by SYSTRA. The Base and Future model scenarios are acceptable for use.

Linsig: The LinSig models of the proposed signalisation of the A1301/ A505 junction and M11 Junction 10 southbound off-slip have been reviewed and accepted by the County modelling and signal teams.

Impact Assessment: The impact assessment identified significant impacts at the following junctions:

- A1301 / A505 roundabout (McDonalds Roundabout)
- M11 Junction 10 (southbound off-slip)
- A1307/ A11 roundabout
  - Maximum queues of 11 (of 41) Passenger Car Units (PCUS) and 26 (of 53) PCUS during the AM and PM peaks respectively resulting from the development.
- Granta Park/ Bourn Bridge Road roundabout
  - Maximum queues of 28 (of 61) PCUS during the AM peak resulting from the development.
- Moorfields Road/ A505 right / left staggered crossroads
  - Maximum queues of 40 (out of 46) PCUS during the PM peak.
- Hunts Road/ A505 roundabout
  - Maximum queues of 22 of 27 PCUS during the AM peak.

15.25 In all cases, suitable mitigation (subject to costings) has been agreed and is sought through condition / obligation. County Transport has no objection subject to the following, comprehensive, multi-modal mitigation package. This is summarised in the draft HoT's and detailed below:

#### 15.26 Mitigation

#### 15.27 Travel Plan (TP)

- Implementation of a site-wide TP for all on-site uses. Each land use/ business shall submit individual TP's with measures specific to their use and dovetailing with the site-wide TP.
- Appointment of site wide Travel Plan Manager.
- For the specific uses including the Hotel and Conference Centre, and the Discovery Centre to include Event Management Plans in their respective TP's to minimise and manage the impacts of events that attract 'larger' numbers of delegates.
- Targets for all mode shares including a target of no more than 40% of Campus external journeys to work to be undertaken as single occupancy car trips. Car journeys no greater than those assessed in the TA.

- To set targets for reducing the percentage of peak hour vehicular trips to and from the site.
- The TP's are to be monitored annually using staff / resident surveys and traffic and other movement counts until 5 years post full occupation.

15.28 The Site Wide TP will include:

- the implementation of a Car Club and a dedicated Car Share Scheme for residents and employees, including allocated and conveniently located spaces and one year of free membership incentives, with details to be approved; and
- the establishment of a Transport Review Group to oversee and discuss the ongoing performance of the site in terms of sustainable travel and monitoring results. In the event the Travel Plan targets are not met, the TRG will agree with the County Council suitable mitigation measures that will be funded through a Travel Plan Contingency Fund and implemented accordingly.

15.29 Travel Plan Contingency Fund

- A fund over and above the Travel Plan budget that can be applied flexibly to respond to any emerging issues and opportunities, to ensure additional mitigation measures are implemented in the event that targets are not met. This may include further improvements to bus services or demand responsive travel, enhanced pedestrian and cycle routes, innovative transport technologies, and/or additional promotion or incentives for sustainable travel.

15.30 Car and Coach Parking and its Management

- A Car and Coach Parking Management Plan shall detail the management and enforcement measures for car and coach parking provided on the development, including registration for ANPR monitoring, provision of accessible spaces and electric charging spaces (through a combination of active and passive points but no less than 20% to be monitored and reviewed) and the allocation of car parking for each land use starting with a provision of no less than 0.46 spaces per employee and a phased review of this in agreement with the Councils. Workers that live on the Campus will be prevented from bringing a car to the multi-storey car parks for business use.

15.31 Rat Running and Off-Site Parking

- A Monitoring Strategy will need to be agreed with the County, which will detail how rat running and off-site parking will be monitored in local villages. In the event there is shown to be an issue for either, there will be a monitoring fund which can be used to implement suitable mitigation measures.

15.32 Walking

- Direct provision of a new section of footway connecting the A1301 (east) to High Street (west) in Hinxton along New Road.
- Direct implementation of the A1301 improvement scheme between the A1301/ A505 junction and A1301/ A11 junction including; footways / cycleways throughout the development and connecting to the existing pedestrian/cycleway

to the west of the A1301, a signalised toucan crossing located to the north of the existing roundabout access and other informal crossing points.

### 15.33 Cycling

- Direct provision of an on-site Cycle Hub with maintenance facilities. An on-site cycle hire scheme for future residents and staff is to be provided that facilitates movement around the Campus and elsewhere including the provision of e-bikes.
- Direct provision of an improved 3.5m cycle route between the Campus and Whittlesford Station, including the upgrading of the existing route, new cycleway and A505 crossing facilities as part of the A505 / A1301 junction improvements.
- Direct provision of the new connection will be provided between the development and the existing cycle route adjacent to the A1301 which starts to the north of North End Road (and which will be upgraded).
- Financial contributions towards improvements between the proposed site and the GCP Greenway proposals in Sawston, such as: provision / widening of existing cycleways, installation of solar studs and potential crossing facilities where agreed with County Transport.
- Financial contribution towards or direct mitigation to provide improvements in cycle links from Saffron Walden towards Great Chesterford and the Campus.
- The facilitation of access across the A11 arising from NUGC as a development requirement if the proposed NUGC allocation comes forward.
- In the event that AgriTech is granted planning permission, provision of a cycleway / path connection on the east side of the A1301 to connect to the AgriTech shared pedestrian / cycleway from Tichbault Road.

### 15.34 Bus and Rail

- Shuttle Bus Service: Developer to provide ongoing enhancement of the existing Campus shuttle bus service which operates between the Campus and Whittlesford Parkway station, to increase frequency to align with train arrival / departure times operating frequency during peak periods to ensure demand is met. This is likely to involve the operation of two shuttle buses. The enhancement is to include off-peak services and weekend services to cater for the future Campus residents and a commitment is sought from Wellcome to seek to allow wider public use (subject to licencing) of the shuttle bus in order to improve its viability. Details of the shuttle bus service are to be provided in a Public Transport Strategy to be approved by CCC prior to commencement and subsequently implemented by the developer.
- Campus Bus Services: Expansion and improvement in capacity of the existing Campus bus services (in line with stage of development delivery) to support the increasing population (employees and residents) across the Campus throughout the day. Details to be provided in a Public Transport Strategy to be approved by County prior to commencement and subsequently implemented by the developer.
- Off-Peak Services: Provision of appropriate off-peak services to serve Cambridge and key local attractions for use by workers, visitors and residents of the development, to encourage and facilitate off-peak travel, to be detailed as part of

the Public Transport Strategy and to consider a demand responsive service. To also provide school shuttle services to Sawston Village College in the event that County are not required to provide such school services through statutory requirements.

- Local Access and Businesses: As part of the Public Transport Strategy and to support the ongoing viability of the services, to make the site bus services available for use by the local community (subject to registration / licencing) and ensure provision of buses during evenings and weekends as required by demand. The Public Transport Strategy to explore opportunities to better connect / combine services with nearby business parks such as Granta Park and Babraham Research Park.

#### 15.35 Highway Improvements and Access

- Access and A1301: Direct delivery prior to occupation (or as otherwise agreed through a phasing condition) of the three site accesses and the A1301 corridor improvements, as set out on the Highway Improvements Plan (PP5) and including footways / cycleways, a signalised pedestrian and cyclist crossing close to the existing access and other informal crossing points, a new footway adjacent to New Road to link to Hinxtton, and gateway features.
- A505 / A1301 'McDonald's Roundabout': Direct implementation of signalised mitigation, hybrid and / or AgriTech scheme or financial contribution as required towards an alternative strategic scheme, as directed by the County Council.
- Moorfields Road and Hunts Road: Direct implementation or financial contribution as required towards signalised mitigation at Moorfields Road and Hunts Road junctions – as per the proposals secured in principle through the AgriTech Hinxtton appeal or as per an agreed alternative scheme / value.
- A11 / A1307 junction and Bourn Bridge Road / Granta Park access: mitigation to include (i) the direct implementation of A11 SB off-slip white lining (prior to first occupation), and (ii) financial contribution towards the Travel hub element of the Cambridge South East Transport Better Public Transport Project (A1307 Phase 2). This scheme aims to create a vital Public Transport link to ease capacity on the network, therefore mitigating (through trip banking) the additional trips associated with the Genome Campus.
- M11 southbound off-slip – junction 10: Mitigation as per Highways England requirement.

#### 15.36 Transport Enhancement Fund

15.37 A financial contribution to establish a Transport Enhancement Fund towards future enhancements to the sustainable network, where relevant opportunities emerge such as but not limited to:

- Whittlesford Parkway Station Masterplan Improvements.
- To investigate potential enhanced connectivity to Whittlesford Parkway station involving off-road cycle and pedestrian links to connect to the station south-east platform without crossing the A505.

#### 15.38 Mitigation relating to the Masterplan

15.39 Detailed design to include:

- A mobility hub which will serve as a place of connectivity for transport modes (walking, bike hire, lift sharing, car clubs, bus services).
- Community concierge providing personal mobility services as well as receiving deliveries, to act as the focus for the TP, and could be co-located at the mobility hub.
- Micro consolidation centre to minimise delivery and servicing movements, and to assist with the deliver and distribution of goods on the Campus by sustainable mode.
- Future proofing for electric vehicle charging points, e-bikes and demand responsive transport.
- Ensuring links through the Campus for walking and cycling are direct and attractive, of sufficient width and car-free routes ensuring direct access to key Campus locations.
- Wayfinding signs throughout the Campus with local destinations and journey times.
- Different land uses to include changing rooms for cyclists and active travellers, dedicated showers proportionate to the number of users and clothes drying facilities.
- Provision of the main route through the Campus to accommodate buses and bus stops at appropriate locations.

Technical Issues

15.40 Technical issues with the TA including growth assumptions, TA methodology and TP commitments have been raised by third parties. These issues are italicised and are specifically dealt with below.

*The highway impact assessment must consider residual cumulative impact on the highway network after accounting for plan led growth. This is a PPG requirement for TA's*

15.41 The TA accounts for specific 'committed' development within the local area of the proposed development and TEMPRO growth is also applied to account for background growth.

15.42 The PPG for TA refers to TA's giving '*appropriate consideration to the cumulative impacts arising from other committed development (i.e. development that is consented or allocated where there is a reasonable degree of certainty it will proceed within the next 3 years). At the decision-taking stage this may require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval.*'

15.43 Given that the Uttlesford Local Plan is not adopted at this stage, and NUGC has no allocation or consent, it was considered reasonable that the cumulative assessment undertaken by the applicant only included those developments that were at the time committed or met the PPG definition detailed above. This rationale also omits the AgriTech site from Wellcome's TA given that it is not existing or approved development.

*The TA undermines the plan led approach to the provision of infrastructure, housing / job delivery within the SCDC LP. Collaborative approach required.*

- 15.44 The development impacts set out in the TA and which the mitigation package is based was through analysis of the 'with' growth scenarios, in which both background growth and committed development were accounted for. The applicant's mitigation proposals demonstrably mitigate the site impacts over and above the future with growth scenario (in line with the cumulative test requirements previously discussed).

*The TA does not fully address or mitigate the impact on the strategic road network*

- 15.45 Further to the submission of the TA for planning purposes the TA was assessed and additional information sought to demonstrate development impacts on each junction and junction arm across the model area. This analysis demonstrated that the additional vehicles queue resulting from the impacts of the development on the Stumps cross junction were contained within the existing on / off slips, and therefore no mitigation has been sought. Additional mitigation measures are to be secured in order to mitigate the development impacts on the A11 / A1307 junction including direct implementation of white lining alterations on the southbound off-slip, which are in keeping with proposals secured as part of the AgriTech development. In addition, a contribution is sought towards Cambridge South East Transport (CSETS) Phase 2 – Better Public Transport Project, to provide a circa. 2000 space travel hub to remove trips towards Cambridge through this corridor.
- 15.46 The signalisation of the M11 / J10 has been reviewed and has been agreed in principle with Highways England.

*The Sustainable Transport Strategy is wholly focussed on South Cambridgeshire and must contain commitments to sustainable modes*

- 15.47 The mitigation package sought requires a financial contribution towards or direct mitigation to provide improvements in cycle links from Saffron Walden towards Great Chesterford and the Campus. The HoT's capture the key measures detailed in the Sustainable Transport Strategy to ensure that these are secured and implemented as part of the mitigation package. Furthermore, the applicant has agreed to facilitate a crossing from NUGC on or near to Tichbault road which could for example include a subway.

*Further evidence that speed limits on the A1301 can be reduced through the TRO process*

- 15.48 The application does not include details of access and therefore this is not a consideration of the application - however access principles have been discussed and relevant conditions will be applied. At the RM stage the developer will need to present a workable / deliverable access, and this will mean they will need to put the relevant TRO's in place. The TRO would be subject to its own process / consultation.

*The southern access would incorporate a banned right turn. How can U turns at Stumps Cross be avoided?*

- 15.49 Further information was provided detailing the distribution of development trips. The assessment considered that no development vehicles u-turn at the Stumps Cross junction and instead travel through the proposed development to vehicular

accesses to the north. It will be for the masterplan and phasing conditions to accommodate and control these movements and minimise the risk of u-turners at the Stumps Cross Junction.

*The proposal compromises SCDC's own LP growth by virtue of its impact on the local and strategic highway network*

- 15.50 The TA produced considers growth on the highway network through inclusion of trips for committed developments and the use of TEMPRO to account for background growth. The Paramics modelling then assesses the network performance with and without the proposed development in place, and where impacts are considered to be 'severe' in accordance with NPPF guidelines mitigation measures have been secured. In essence the model assumptions account for the future Local Plan growth and with mitigation it is demonstrated that these proposals can be accommodated over and above that.

*The Paramics modelling doesn't include the critical M11 SB to A505 EB movement*

- 15.51 The delay on the M11 J10 shows reductions compared to how it would be in the reference case without the mitigation. Although this journey time hasn't been provided the delay information provided indicates there are journey times savings compared to the reference case.

#### Cumulative Impact

- 15.52 The TA submitted by AgriTech in support of its appeal included a cumulative assessment of the Wellcome application at the request of the County Transport Team. Under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) the Council / Inspector / Secretary of State has the right to request further information. This could include further information such as a cumulative assessment of transport or other environmental impacts. If the appellants had not undertaken a cumulative TA of Wellcome, there would have been the possibility of a Reg. 22 request being made by the Council / Inspector / Secretary of State. The approach on AgriTech could therefore be viewed as a precautionary undertaking to avoid potential delay following the closure of the Inquiry.
- 15.53 As part of the appeal proceedings the County Transport Team agreed to the appellant's cumulative assessment and that the proposed mitigation for the McDonald's roundabout proposed by SmithsonHill was capable of satisfactorily accommodating the transport impacts associated with both Wellcome and AgriTech. This was agreed in May 2018 as part of the Transport Statement of Common Ground and prepared as part of the appeal proceedings for AgriTech.
- 15.54 There is no timetable for when the SoS will issue a decision in relation to AgriTech. To that extent and in the event that the Wellcome proposal is supported and the AgriTech appeal is allowed, the Wellcome S106 would have to take into account a number of scenario's in relation to transport mitigation options for McDonald's roundabout. These scenarios are set out below. That notwithstanding, if this application is endorsed for approval by the Members of the Planning Committee, the Council will have to notify the Inspector / SoS of its decision and it will be for the Inspector / SoS to determine whether any further cumulative assessment (such as in relation to LVIA) is required as part of the AgriTech proposal.

## Scenarios

- 15.55 The S106 would be required to anticipate the possibility and account for the practicalities of implementing two different sets of mitigation proposals promoted by Wellcome and AgriTech at the McDonalds roundabout should AgriTech gain planning permission. The following text explains a potential process that would secure the highway mitigation proposed whilst minimising unnecessary or abortive works, including clear triggers that can be used to ensure that the required transport mitigation for that scheme are provided at the appropriate time.
- 15.56 Some Members may recall that the AgriTech scheme seeks to deliver a pedestrian cycle / bridge over the A505 which would connect from a proposed transport interchange on the NW side of the McDonald's roundabout to the AgriTech site on its SE side. The bridge landing points are not on public land and the cycle / pedestrian route from within the AgriTech site would also run on private land along the eastern side of the A1301, connecting to the proposed business park and terminating close to Tichbault Road which is the northernmost extent of the Wellcome application site boundary. The AgriTech mitigation for the A505 together with the potential for a strategic scheme for the A505 arising out of the Combined Authority's A505 Study have to be accounted for in S106 scenario planning.
- 15.57 If granted planning permission, Wellcome wish to commence construction within 18 months. With this in mind, there are 5 possible scenarios - A to E - summarised below:
- A. the Wellcome Trust (WT) application is approved but the AgriTech (AT) application / appeal is refused;
  - B. the WT application is approved and development comes forward ahead of any AT permission;
  - C. the AT application / appeal is granted planning permission and comes forward ahead of development of the WT application;
  - D. both the WT and AT applications come forward simultaneously or at very similar times.
  - E. a contribution is drawn from the S106 and used towards the provision of a strategic A505 scheme.
- 15.58 Each scenario could operate in the following way:

### Scenario A

- 15.59 Step One: Submit details of the McDonald's Roundabout improvement scheme to CCC for approval, such details to be in general conformity with the works identified as part of the TA, unless otherwise agreed in writing with CCC.
- 15.60 Step Two: The works would then be required to be practically complete before occupation of more than 15,000 sq.m of Research and Translation uses.

### Scenario B

- 15.61 Scenario B would be identical to Scenario A for the WT. If AT were granted planning permission, CCC should require that the detailed design of any necessary enhancements that their scheme requires are submitted for approval (as per Step 1 of Scenario A) and should be required to take into account the agreed WT works so that only any additional works that are required in relation to

AT are delivered. This would reduce unnecessary construction impacts while minimising any duplication of resource or abortive works.

### Scenario C

- 15.62 Scenario C would require AT to undertake the equivalent of Steps 1 and 2 of Scenario A subject to the relevant occupation triggers and restrictions, in line with the scheme presented within the draft UU (submitted in June 2019) associated with the appeal.
- 15.63 The WT detailed design (as per Step 1 of Scenario A) should be required to take into account the agreed AT works when the detailed design of any WT works that may be required is agreed with CCC to ensure that only those additional works (should any such additional works still be required) are secured.
- 15.64 This would reduce unnecessary construction impacts while minimising any duplication of resource or abortive works and ensure the detailed design of the AT works has adequately mitigated WT.

### Scenario D

- 15.65 Step 1 happens in parallel for both AT and WT and the detailed design agreed with CCC is based on the proposed AT mitigation package which is acknowledged to provide for both AT and WT to come forward.
- 15.66 A cost apportionment exercise is undertaken to attribute the costs associated with agreed transport works as appropriate to the assessed scale, impact and modal shift of each scheme.
- 15.67 Either of AT or WT or CCC elects to undertake the works in accordance with an agreed timetable.
- 15.68 Appropriate and proportionate occupation triggers and restrictions (that are equivalent to and no more restrictive than those linked to the transport mitigation works that have been identified in respect of the respective schemes) are imposed on AT and WT until the agreed highway works have been carried out. Any unspent monies are returned.

### Scenario E

- 15.69 A strategic A505 scheme is identified and works to provide for this would mitigate the transport impacts arising contemporaneously with Wellcome's transport impacts. The County Council would draw down a contribution from the S106 towards the strategic scheme equivalent to the value of the McDonald's roundabout scheme and/or the schemes at Moorfields Road and Hunts Lane.

### Officer Conclusions on Transport

- 15.70 The TA submitted with the application and the Sustainable Transport Strategy have been subject to considerable assessment and scrutiny by the County Council and your officers. Although there have been substantial concerns raised regarding the TA, the methodology and modelling have been undertaken in accordance with Department of Transport guidelines, using up-to-date information and the subsequent conclusions within the TA are considered sound. The transport impacts would not be severe and as such the proposal complies with NPPF para. 109 and LP policy TI/2.

- 15.71 Where an impact has been identified within the TA, suitable mitigation has been identified and would be secured through the S106 agreement and / or planning conditions. A draft site wide Travel Plan would be secured for approval as part of the S106 to ensure that its measures would be implemented. It would be monitored and updated throughout the lifetime of the development and funds are put in place to allow for the transport mitigation to flex throughout its implementation. Highways England, the strategic highways authority has not indicated a requirement to up-grade junction 9 of the M11. Such measures and their cost are unnecessary in order to grant planning permission and would be disproportionate to the scale and impact of the proposal.
- 15.72 The applicant's existing Travel Plan has been successful and there is no reason to suggest that a wider Travel Plan for the expanded Campus could not be of equal or greater success in minimising the use of the car to travel to the site. The proposed improvement to McDonalds roundabout show it operating within capacity when the development is completed and modelling shows overall improvements in journey times across the highway network as a result of the mitigation. If TP targets are not being achieved, a TP Contingency fund is to be set aside within the S106 to respond and help meet targets.
- 15.73 Rat running from the expanded Campus would be monitored together with off-site parking and in the event of issues arising, there would be a monitoring fund to be secured which would be used to implement mitigation measures.
- 15.74 Subject to the suggested mitigation measures through the S106 and appropriate planning conditions, the proposal complies with LP policies TI/2, TI/3 and NPPF paras. 102 – 111.

## **16.0 Flooding, Drainage and Water**

- 16.1 LP policies CC/4 'Water Efficiency', CC/7 'Water Quality', CC/8 'Sustainable Drainage Systems' and CC/9 'Managing Flood Risk' require development proposals to demonstrate that:
- All new residential developments must achieve as a minimum water efficiency to 110 litres pp per day and for non-residential buildings to achieve a BREEAM efficiency standard. The standards sought are higher than Buildings Regulations because the District is in an area of water stress as designated by the EA.
  - There is adequate water supply, sewerage and land drainage systems to serve the whole development or agreement to provide the necessary infrastructure with the relevant service provider.
  - The quality of ground, surface or water bodies will not be harmed.
  - Development proposals incorporate appropriate sustainable surface water drainage systems (SuDS) appropriate to the nature of the site.
  - There has been incorporation of appropriate and suitable flood protection or mitigation measures appropriate to the level and nature of flood risk that would not increase flood risk elsewhere. Flood Risk Assessments (FRA's) should be prepared for sites over 1 ha in size.

- 16.2 Paras. 163 and 165 of the NPPF are relevant. Adoption and Maintenance of Sustainable Drainage Systems in South Cambridgeshire (2016) is a policy document which explains the Council's position on maintenance of SuDS measures. Specifically, it outlines that the Council is not responsible for the maintenance of SuDS measures and that it expects applicants to provide information to demonstrate that suitable adoption and maintenance arrangements are in place.
- 16.3 Chapter 15 of the ES (Water Resources) assesses the likely environmental effects of the proposal with respect to water resources and flood risk, including foul and surface water flows and potable water demand. The appendices to the ES include the following: Flood Risk Assessment (FRA); Foul and Surface Water Drainage Strategy; Ground Conditions Study; Plan of existing stormwater infrastructure; and a Water Resources Note. Separate to the ES is a Foul Sewerage and Utilities Assessment.
- 16.4 The ES and supporting documents are put forward to demonstrate that the requirements of the LP in relation to water quality, sustainable drainage and the management of flood risk have been fully considered and that appropriate strategies for addressing these requirements are detailed at the RM's stage.
- 16.5 In relation to water efficiency (LP policy CC/4), the Sustainability Statement submitted with the planning application proposes water efficiency measures which respond to the policy requirement for a water conservation strategy and to demonstrate that levels of water efficiency can be achieved that exceed the requirements identified above. It proposes that domestic and commercial water consumption would be measured using smart meters. Through use of efficient fixtures and fittings, including leak detection, it is anticipated that the proposal could reduce potable water demand by 40% to 90 litres/person/day over the business as usual practice scenario of 150 litres/person/day. It is anticipated that the precise measures to deliver water efficiencies and an assessment of their effectiveness would be set out at RM's stages through the submission of stage-specific Sustainability Statements.

#### *Constraints*

- 16.6 The Campus Land comprises 10.25Ha of greenfield site and hardstanding. The Expansion Land to the east of the A1301 comprises approximately 113.05Ha of largely permeable agricultural land and is largely undeveloped apart from a former railway embankment (now overgrown) and a series of small agricultural barns accessed from the A1301.
- 16.7 Chalk underlies the site and is classified as a principal aquifer. The majority of the Expansion Land (its eastern portion) is within a Source Protection Zone (SPZ) 2. The remainder of the site, including land on the western side of the A1301, lies within SPZ 3. SPZ's are areas receiving additional protection and restrictions to avoid contamination of groundwater supplies used for drinking.
- 16.8 Within the Expansion Land, the topography falls from east to west, with a high point located about half-way along the eastern boundary near to which a drainage ditch runs across its middle towards the A1301. This drainage ditch has no outfall and forms part of the valley as characterised by the DAS. The Expansion Land is greenfield and surface water within this area infiltrates into the ground and the chalk aquifer below.

- 16.9 The Campus Land drains from east to west via a piped gravity system and to a series of swales which drain the runoff to the Campus wetlands area before discharging to the River Cam.
- 16.10 The Environment Agency (EA) flood map shows the extent of Flood Zones adjacent to the site. No part of the site is in Flood Zones 2 or 3, and therefore the full site area is located within Flood Zone 1 (low probability of flooding). The proposal is therefore not currently at significant risk of surface water flooding.
- 16.11 The Expansion Land is not connected to any public foul (wastewater) drainage or combined drainage infrastructure within the Site. The Existing Campus is serviced by a gravity foul water network that drains to a pump station located within the Existing Campus. A rising main conveys the foul water to the Great Chesterford STW located to the south of the existing Campus. The ES confirms that Great Chesterford STW is not operating at full capacity and an initial phase of the development could be accommodated without any upgrade works being required.

### *Overview of Assessment and Strategies*

#### *Flood Risk Assessment*

- 16.12 The ES confirms that the FRA has been produced in accordance with the NPPF and considers fluvial flooding, pluvial flooding, groundwater flooding, flooding from drains and sewers, flooding from water mains and flood risk from artificial sources. The assessment considers the risk of flooding on and off the site, taking into account the proposed approach to drainage set out in the Foul and Surface Water Drainage Strategy and taking into account climate change.

#### *Surface Water Strategy*

- 16.13 The Surface Water Drainage Strategy has been developed to mitigate surface water flood risk, allowing for a 40% increase in rainfall intensity due to climate change. The strategy aims to reproduce the current conditions. It is proposed that no stormwater from the proposal would be discharged externally from the site and that surface water run-off is limited and controlled through a hierarchal (SuDS) conveyance, to include (but not be limited to) the following:
- Primary treatment in the form of green roofs, permeable paving, tree pits and raingardens. These systems would treat rainwater across all types of catchments.
  - Secondary treatment (for trafficable and parking areas) through bio-retention basins, located on the edges of the residential areas. These could also use vegetation and filter media to treat the water via filtration.
  - Tertiary treatment where infiltration would naturally occur as the final stage of treatment as the water that has been treated and filtered down to the bottom of the basins and swales and would infiltrate into the groundwater.
- 16.14 In relation to the SPZ, a tailored approach is proposed to SPZ 2 and areas within SPZ 3 in line with EA advice. Within SPZ 2 a minimum of at least two stages of pollution treatment is suggested before water is to be allowed to discharge to ground.

- 16.15 The common, which is proposed to occupy a low-lying area of land adjacent to the A1301 would receive, treat, store and infiltrate stormwater. The intention is for 1 in 5-year stormwater surface water runoff to be attenuated and infiltrated using underground cells to ensure the common remains usable (with no above ground water storage) for most of the time. When there is a storm event, the excess stormwater would be stored above ground as part of a shallow bunded basin.

#### *Foul Water*

- 16.16 The proposal seeks to create a foul network connection to Great Chesterford STW. This is operated by Anglian Water and they are obligated to accept the foul flows from the proposed development under the Water Act. Anglian Water will be required to design any upgrades to ensure that the water quality of the Cam is not impacted upon.

#### *Construction Environmental Management Plan (CEMP)*

- 16.17 Impacts on water quality arising from construction impacts would be controlled through a CEMP condition.

#### *Objections*

- 16.18 Objections have been raised from third parties on the grounds of an increase in the risk of flooding arising from the development. This risk is assessed as part of the officer summary below.
- 16.19 Hinxton PC has asked for the construction of a static compound side-weir on Wellcome land close to Hinxton Mill in order to help improve the management of the River Cam. Hinxton PC state that this would result in long-term benefits to the Genome Campus, to Hinxton and to villages downstream and that it would substantially mitigate the flood consequences of increased water flow arising by removing any risk of water backing up upstream of the Mill in times of high rainfall. Officers have met Hinxton PC and Cambridge Past Present and Future on site to understand the proposed mitigation, which is put forward on the basis of increased foul flows from the nearby sewerage treatment works. The EA has been consulted and they advise that if Anglian Water subsequently look to increase their discharge rate, this would be dealt with via a permit application. The EA do not consider the request justified and officers therefore do not support the S106 request as it would not be CIL compliant. Hinxton PC have been advised that the request is better progressed separate to the planning application.

#### *Officer Conclusions on Flooding, Drainage and Water*

- 16.20 Anglian Water advise that whilst their water recycling centre does not have headroom within the current flow permit to receive the flow from the entire development, there is headroom to receive the hydraulic loading from an initial phase of the development site. They advise no significant impact on the performance of the foul sewerage network. A phasing condition seeks to ensure adequate capacity will always be available for the scheme.
- 16.21 The Environment Agency (EA) raises no objection to the scheme. In relation to foul provision, their advice correlates with that of Anglian Water. Regarding water efficiency the EA advise that the reduced water usage with aspiration to achieve a target of 90 litres pp/pd is supported. Regarding groundwater and contaminated land, the EA advise of the high sensitivity and potential pollutant / contaminant

linkages to controlled waters. The EA recommend conditions relating to: contamination and remediation; surface water and infiltration; piling; foul water; construction surface water run-off; and materials management. Various informatives are proposed. These are reflected in the proposed conditions set out within appendix A.

- 16.22 The Council's Sustainable Urban Drainage Officer supports the Surface Water Strategy, including the proposed treatment of water within the SPZ. He states that there is sufficient space for the storage of the required surface water run-off in the event of an extreme rainfall event and that the proposals have demonstrated that a suitable and appropriate strategy can be delivered on the site. A SuDS condition securing detailed elements and maintenance and management provisions is proposed. The advice is mirrored by the Local Lead Flood Authority (LLFA) who are similarly supportive of the drainage strategy put forward by the applicant.
- 16.23 The information submitted within Chapter 15 of the ES (Water Resources) and in particular in relation to the FRA, Surface and Foul Drainage Strategies and protecting water quality from construction, has been worked up with and has gained support from both internal officers at the Councils, the EA and the LLFA. Subject to conditions, the application accords with LP policies CC/4, CC/7, CC/8 and CC/9.

### **Sustainability, Climate Change and Energy**

- 16.24 Local Plan Policy CC/1 'Mitigation and Adaptation to Climate Change' states that planning permission will only be granted for proposals that demonstrate and embed the principles of climate change mitigation and adaptation into the development. Applicants must submit a Sustainability Statement to demonstrate how these principles have been embedded into the development proposal.
- 16.25 Policies CC/2 'Renewable and Low Carbon Energy Generation' and CC/3 'Renewable and Low Carbon Energy n New Developments' seek to permit proposals to generate energy from renewable and carbon sources and require proposals for new dwellings and non-residential buildings greater than 1,000 sq.m to reduce carbon emissions over Building Regulations requirements by a minimum of 10% through on-site renewable energy technologies.
- 16.26 On developments where a show home is being provided, policy CC/5 'Sustainable Show Homes' requires sustainable show homes to be provided demonstrating standards of environmental sustainability that go beyond those agreed for the development.
- 16.27 The NPPF paras. 148 154 are relevant.
- 16.28 A Sustainability Statement and an Energy Statement have been submitted with the application. The documents demonstrate that the requirements of Policies CC/1, CC/2, CC/3 and CC/5 would be met. They establish a bespoke approach to sustainability which seeks to incorporate the flexibility to respond to emerging technologies and to monitor, review and adapt the approach over time.
- 16.29 *Officer Conclusions on Sustainability, Climate Change and Energy*
- 16.30 The Council's Sustainability Officer has reviewed the DAS, ES chapter 16 (Climate Change), Sustainability Statement and Energy Statement submitted with the application.

16.31 They advise that the application is showing a high level of ambition in relation to integrating the principles of sustainable design and construction into the design of the development, taking things a step further through the introduction of the Restorative Sustainability (restoring the soil health by protecting and improving the soil organic content) approach. Resilience, sustainability and health and wellbeing are strongly embedded within the core development objectives and masterplan principles, with the applicant clearly taking a legacy landowner approach to development. This level of commitment is to be welcomed.

16.32 The application includes a range of commitments and targets in relation to sustainable design and construction, including:

- Framing of the sustainability targets around 12 sustainability principles, which have been informed by One Planet Living with the addition of themes around governance and climate resilience. Certification schemes such as BREEAM Communities and WELL Communities have also been integrated into the sustainability principles, along with the United Nations Sustainable Development Goals. Discussions are being held with the WELL Institute to explore the potential of the site being a pilot for the WELL Communities Standard, which is supported;
- A long-term commitment to achieving a carbon positive development, with consideration given to issues such as the Circular Economy, carbon sequestration in soils and woodland and embodied carbon. A Circular Economy Strategy is to be prepared to inform Development Briefs;
- A commitment to delivering 10% net gain in biodiversity as part of a Restorative Sustainability approach;
- The integration of SuDS into the landscape;
- High water efficiency standards, both of which exceed the Council's policy requirements. For residential development, the target is max 90 litres/person/day, while for non-residential development a minimum 40% improvement over the notional BREEAM building is the target, equivalent to 3 credits under Wat01 of BREEAM;
- A commitment to post-occupancy evaluation for a year after first occupation to allow energy and water consumption to be monitored and improvement targets set;
- In relation to climate resilience, alongside increased risk of surface water flooding, consideration is also given to measures to reduce the risk of overheating in the built environment. A commitment is made to carrying out thermal modelling, alongside the use of the cooling hierarchy to design out the risk of overheating without the need to utilise air conditioning.
- The inclusion of an energy centre with site wide district heating. Alongside pv panels, this heat network will help the scheme exceed the minimum 10% reduction in carbon emissions. Initial calculations, suggest an 18% reduction in emissions, with an overall 25% reduction in emissions compared to Building Regulations. The choice of technology for the district heat network is to remain open. It would be 3rd generation system (3G) with capability to transition to 4G over time. 4G networks are based on reduction in circulation temperature allowing low temperature renewables (e.g. electric or ground source heat pumps) and potentially waste process heat recovery (e.g. data centre heat).
- The use of a biophilic design to help inform Development Briefs. Biophilic design integrates nature and natural elements into architectural design to improve the health and wellbeing of building users and the wider environment.

- Reference to the role that Show Homes could play in helping residents understand the sustainability standards of their homes.
- The development of a Sustainable Procurement Plan for individual buildings to reduce embodied carbon in the choice of materials.

16.33 The applicant sets out that sustainable development will be driven by the bespoke sustainability framework set out in the Sustainability Statement. However, it is recognised that established sustainability assessment schemes, such as BREEAM, Home Quality Mark and Passivhaus, can be an efficient tool for capturing a baseline of good practice thus allowing the overarching bespoke framework to focus on riving innovation. The applicant states:

- All non-residential buildings will commit to a minimum BREEAM rating of Very Good, with an aspiration to maximise the score on a building by building basis.
- The potential benefits of applying Home Quality Mark and Passivhaus standards will be reviewed at the detailed design stage.

16.34 With regards to electricity infrastructure the existing Campus has some spare capacity that can be used to accommodate early phases of the development. Beyond this, grid reinforcement will be required with a new primary substation at Fulbourn. The Sustainability Officer recommends consideration of smart energy systems in helping the development better utilise available grid capacity, which may help to reduce some of the reinforcement needs and associated costs.

16.35 All of the sustainability measures are supported by the Councils Sustainability Officer and are secured via proposed conditions within appendix A. Subject to this, the proposal would accord with SCLP policies CC/1, CC/2, CC/3, CC/4, CC/5.

### **Utilities**

16.36 LP policy TI/8 states that planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms.

16.37 The applicant has submitted a Foul Sewerage and Utilities Assessment (Utilities Assessment) which identifies existing and required utility infrastructure to support the development.

### **Digital Infrastructure**

16.38 LP policy TI/10 'Broadband' requires new development to contribute towards the provision of infrastructure suitable to enable the delivery of high-speed broadband services across the District. Fixed telecommunications infrastructure in the form of copper and fibre are owned by BT Openreach; located within the verge of the A1301.

16.39 The Utilities Assessment sets out that for the research and translation uses, connections would be via an extension to the Janet network (UK research and education network) that connects the existing Campus. High-speed internet connectivity would be provided to the residential development and this is secured through a proposed condition within appendix A.

### **Electricity**

- 16.40 The existing electricity network is owned and operated by UK Power Networks. The electricity network within the Hinxtton area is supplied from Sawston Primary Substation that in turn is fed from the Fulbourn Grid Substation. The existing Campus currently self generates electricity through Combined Heat and Power to produce 2MWe (or 2MVA) generating 40% of its energy requirements and a 10MW diesel backup generator.
- 16.41 For the full occupation of the development, UK Power Networks have confirmed that a new Primary Substation is expected to be required. The point of connection for the primary substation would be Fulbourn.

#### Gas

- 16.42 The existing gas network is owned and operated by Cadent. An existing medium pressure gas pipe is located within the A1301 Mill Lane which supplies Hinxtton village, the existing Campus and existing sewage treatment works.
- 16.43 No objection is raised by Cadent Gas in their response to the application. Cadent indicate within the appendix to the Utilities Assessment that the existing medium pressure gas main may not have sufficient capacity for the development once fully occupied and therefore reinforcement works may be required.

#### Potable Water

- 16.44 Potable water is provided by Cambridge Water (owned by South Staffs Water). An existing water main runs underground within the verge of the A1301 Mill Lane, which supplies Hinxtton village and the existing Campus and which itself is fed from the Cambridge Water trunk main located along the A505.
- 16.45 Cambridge Water has not responded directly to the application but set out in the appendix to the Utility Statement that capacity is available from their existing network. The EA state that Cambridge Water Company can supply the development using their existing network until 2045. Thereafter it is stated that Anglian Water would supply the site. The applicant would have to ensure water supplies in the long term for the site post 2045. This is for the applicant to secure directly with the relevant supplier.

#### *Officer Conclusions on Utilities*

- 16.46 Subject to recommended conditions including phasing and appropriate connections being secured by the applicant to the necessary utilities, the development would accord with LP policies TI/8 and TI/10.

#### **Biodiversity and Trees**

- 16.47 LP policy NH/3 states that when considering proposals for the change of use or diversification of farmland, particular consideration shall be given to the potential for impact upon priority species and habitats. LP policy NH/4 states that development proposals will be permitted where the primary objective is to conserve or enhance biodiversity. Opportunities should be taken to achieve positive gain through the form and design of development. Alongside these policies, NH/6 encourages proposals which create new green infrastructure and enhance public enjoyment of it. The NPPF paras. 170 and 175 are relevant.
- 16.48 The applicant sets out that the development proposes extensive new green infrastructure measures that are intended to contribute to a variety of functions,

including the creation of a high-quality environment that will contribute to the amenity and wellbeing of its users and will support biodiversity. DP12.1 secures the improvement and enhancement of the biodiversity value of the site, committing the applicant to an overall net biodiversity gain of 10% or more.

- 16.49 Chapter 9 of the ES assesses the likely effects of the development on biodiversity. The April 2019 amendments included an ES Addendum with the following relevant replacement appendices:
- 5.3: Arboricultural Implications Report
  - 9.1: Preliminary Ecological Appraisal Report
  - 9.2: Biodiversity Survey Methods and Results
  - 9.3: Biodiversity Calculations Methods and Results
- 16.50 Additional biodiversity net gain calculations and information pertaining to badgers was submitted to the Council in August to directly address outstanding concerns raised by the Council's Ecology Officer. DP12.3 it includes a Badger Mitigation Strategy that will form part of future Construction Environmental Management Plans (CEMP's) and the Landscape and Ecology Management Plan (LEMP) which are secured via planning conditions.
- 16.51 The applicant states that the proposal would deliver widespread habitat creation on currently low-value arable land for the benefit of a variety of species and that the proposal would result in a net gain in biodiversity.
- 16.52 In relation to green roofs, there is no detailed design for buildings and as such DP13.2 seeks to achieve these only where feasible. There is no commitment by Wellcome to a minimum level of provision, albeit they expect that approximately 30% of roof space of the commercial buildings would be able to accommodate living roofs.

#### *Objections*

- 16.53 Third parties object on biodiversity grounds including the biodiversity and ecological stewardship elements, methodology and value given the extent of built development that would arise. A lack of commitment to a minimum green roof provision is raised. A wider package of improvements to the management of the surrounding countryside on land within Wellcome's control including land to the north of Hinxton is sought by Hinxton PC.
- 16.54 Officers consider that whilst it may be desirable to allow additional public access to this land, it is outside the application site and it is not necessary to secure wider access or require a higher standard of environmental stewardship in order to grant planning permission. The request is therefore not CIL compliant. Wellcome has confirmed that both Lordship Farm and Hinxton Meadows currently fall under an existing Higher Level Stewardship scheme where the farming is carried out in conjunction with this. Adopted policy does not require a minimum % of green roof provision and the approach set out by Wellcome is reasonable.

#### *Officer Conclusions on Biodiversity and Trees*

- 16.55 The Council's Ecology Officer and the Wildlife Trust originally raised concerns regarding the plans, the Dev. Specification, badger sett buffers and biodiversity calculations contained within the ES. The applicant has addressed these concerns through the April 2019 amendments and in further dialogue with the Council's Ecology Officer. The Council's Ecology Officer raises no objection

subject to appropriate ecology conditions. Natural England has not objected to the application.

- 16.56 The Council's Tree Officer has raised no arboriculture or hedgerow objections to the principle of the application. The overarching principles of the landscaping strategy are supported. Further advice in relation to the preparation of detailed landscaping schemes and their management is given. A range of conditions is proposed.
- 16.57 Subject to conditions, officers are of the view that the proposal complies with policies NH/3, NH/4 and NH/6.

## **17.0 Environmental Health**

- 17.1 The land contamination, air quality and noise and vibrational impacts associated with the construction and occupation of the site are addressed by LP policies CC/6 'Construction Methods', CC/7 'Water Quality', SC/9 'Lighting Proposals', SC/10 'Noise Pollution', SC11 'Contaminated Land', SC/12 'Air Quality' and SC/14 'Odour'. Paragraph 180 of the NPPF advises that planning policies and decisions should mitigate and reduce to a minimum potential adverse impacts resulting noise from new development – and avoid noise giving rise to significant adverse impacts on health and quality of life.
- 17.2 The relevant chapters of the ES and their associated appendices - which have been reviewed by the Council's Environmental Health Team - include those relating to: Construction; Light Pollution; Transport and Access; Air Quality; Noise and Vibration; Water Resources; Waste; and the associated April 19 ES addendum. Key construction mitigation proposed by the applicant includes:
- Operation of Considerate Constructors Scheme (CCS).
  - Compliance with an Outline Construction Environmental Management Plan (CEMP) and detailed CEMP's for appointed contractors including Construction Method Statements.
  - An Outline CEMP forms part of the ES at appendix 6.1. At para 7.4 of the document it states that during working hours, delivery/collection construction vehicles would only access the site between 10:00 and 16:00, to avoid peak traffic times in the area. It also includes ES mitigation in relation to agricultural land and soils, cultural heritage, biodiversity, landscape, light pollution, transport, air quality, noise and vibration, water resources and flood risk, waste management, monitoring, reporting and review mechanisms.
  - A Construction Traffic Management Plan (CTMP) to be secured which would set out off-site construction routing ensuring HGVs travel via designated A-roads only.
  - Appointment of a Community Liaison Manager, engaging with the community / stakeholders to provide appropriate information and to resolve issues of concern.
  - A Soil Resource Plan to be produced as part of the Outline CEMP. Topsoil reuse would create an acoustic bund along the eastern boundary of the Expansion Land in order to safeguard residential amenity from noise from the A11. The Soil Resource Plan would ensure a balance of soil cut and fill, resulting in no requirement for large scale soil import or export.
  - A Site Construction Waste Management Plan. All construction waste would be treated for recycling and recovery in line with the waste hierarchy and local policy targets, rather than being disposed of landfill.

- Outline (Operational) Waste Management Strategy which includes reference to RECAP (Cambridgeshire County Council and Peterborough City Council 2012). It aims to that once the development is operational, participation rates and capture rates for recyclable materials will be maximised, thus increasing recycling rates, which in turn would reduce pressure on local waste infrastructure.
- The Sustainability Statement establishes the intention to develop a Circular Economy Strategy to identify opportunities for promoting and implementing resource efficiency throughout the whole life cycle of the development, including design, construction and occupation.
- An Outline Lighting Strategy has been prepared and provided in chapter 11 of the ES. Owing to the outline nature of the application, details of any lighting to be provided are to be agreed at RM's as part of detailed Lighting Strategies.

### *Concerns*

- 17.3 The site lies within the Imperial War Museum (IWM) Duxford Air Safeguarding Zone 2, where there is a height restriction of 45m. The proposed site is under a flight path. Although IWM planes are flying at a high altitude over the proposed site, IWM has concerns about noise abatement once the development is complete and are concerned regarding notification of any intention to use cranes. Wellcome has subsequently met with IWM to understand the level of weekend and showcase days and have sought further advice from their noise consultant. This has confirmed that there is no need for any further assessment or mitigation over and above what is already set out in the ES. Cranes would be licensed and appropriately lit.
- 17.4 Third parties have raised issues in relation to increases in pollution (dust, air quality, noise, light, vibration) and a reduced quality of life that would result to existing residents.

### *Officer Conclusions on Environmental Health*

- 17.5 The Council's Environmental Health Team has assessed the relevant ES chapters quoted above and advise the following:

#### *Air Quality*

- 17.6 The ES Air Quality Assessment methodology and results are acceptable. The implications of the proposals in relation to potential impacts on local air quality have been considered and no objection is raised.

#### *Contaminated Land*

- 17.7 Ground conditions and contamination are not considered likely to give rise to significant effects. A Preliminary Risk Assessment (PRA) has been submitted to support the Ground Engineering Desk Study November 2018. The outcome of the PRA is agreed. The potential sources of contamination identified on site would present a low or very low risk to proposed users. An informative regarding unidentified contamination remediation is recommended.

#### *Noise and Vibration, Traffic Noise and Earthworks Bund*

- 17.8 Existing nearby residential premises will be exposed to construction noise that will be transitory in nature, but this will also affect future occupiers of newly built properties on the site that become available for habitation before the overall

works are completed. Road traffic noise from the A11 is also an issue and of prime importance is the introduction of an earth bund to the east of the residential area. Conditions are recommended to secure the delivery of the earth bund and noise mitigation.

#### *Operational Phase Noise Impacts – Non-Residential Use Classes*

- 17.9 Noise and odour impacts could result from mechanical plant and extraction equipment installed at commercial premises. Further detailed design information at the RM's stage is needed, and noise assessments of this plant are required to identify noise attenuation measures that may be necessary. Conditions recommended.

#### *Odour*

- 17.10 Concerns regarding the adverse impacts from odour generated by operations at Great Chesterford STW are raised in relation to Dev. Area 2 which is closest to the STW's. The EA indicates that the STW will not be able to cope with future demands and will need to be expanded. It is anticipated that when expanded the latest technology at that time will be used to prevent/mitigate odour releases from the site. However, full abatement cannot be guaranteed. Dev. Area 2 is down-wind of the sewage. As it is not possible to predict what the future odour impacts may be at this stage, a degree of flexibility should be incorporated into the design/layout of the buildings proposed there to enable retro fitting of odour abatement plant at a later date if found to be necessary. An odour assessment for buildings in Dev. Area 2 is recommended as a condition.

#### *Artificial Lighting*

- 17.11 The ES includes an Outline Lighting Strategy. Detailed design information with regards to the layout of the site and lighting design is not available at this stage. Post-completion lighting levels from external lighting e.g. highway, security, public area lighting, commercial areas etc. have the potential to cause nuisance to and be detrimental to the amenity of existing and proposed residential premises. The impact from artificial lighting from the commercial areas will also need to be considered. Lighting details recommended to be secured by condition.

#### *Waste Management*

- 17.12 In order to ensure waste is adequately considered at the outline stage and any following reserved matters applications, a condition securing a Waste Management & Minimisation Strategy (WMMS), including the completed RECAP Waste Management Design Guide Toolkit is recommended.

#### *Renewable Energy Strategy/Report*

- 17.13 If air source heat pumps and/or micro-wind turbines are considered, then further noise impact assessment and/or a noise insulation scheme may be required. In the absence of any detailed information a condition is recommended to control any noise associated with renewable energies that may be installed at a future date.

#### *Conditions*

- 17.14 The following conditions are recommended:

- Unidentified contamination informative
- Earthworks plan
- Site wide phasing plan
- Outline CEMP
- Detailed CEMP
- Construction and demolition hours
- No bonfires or burning of waste
- Noise assessment and mitigation residential
- Noise insulation informative
- Noise assessments and schemes of insulation
- Collection and delivery hours
- Commercial use noise informatives x3
- Odour assessment Dev. Area 2
- Lighting assessments for RM applications
- Waste management and minimisation strategy
- Renewable energy noise

17.15 Whilst it is inevitable that the construction of the site will give rise to impacts on residential amenity, subject to conditions the scheme could be suitably mitigated to ensure the impact is minimised. Officers are satisfied that the proposal accords with LP policies CC/6, CC/7, SC/9, SC/10, SC11, SC/12 and SC/14.

#### **Waste Services and Infrastructure**

17.16 Policy TI/8 'Infrastructure and New Developments' states that permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms.

17.17 The Waste Services team has sought S106 contributions towards additional vehicle capacity and contributions towards bins. A cardboard skip and the provision of two bring banks are also sought. The applicant has agreed to the request and the sought triggers for payment The DAB's and Design Guide(s) would secure the provision and appropriate design of these as part of the phased development of the site.

#### **Agricultural Land Quality and Soils**

17.18 LP policy NH/3 'Protecting Agricultural Land' states:

17.19 *'1. Planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless:*

- a) Land is allocated for development in the Local Plan;*
- b) Sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land...'*

17.20 The NPPF para. 170 is relevant and states:

17.21 *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*

b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland*'.

- 17.22 Chapter 7 of the ES deals with Agricultural Land Quality and Soils and includes Appendix 7.1: Agricultural Land Classification (ALC) and Soil Survey (January 2018). The ALC concerns the Expansion Land, which is in agricultural production for cereal crops and potatoes. The assessment of the loss of agricultural land assumes that agricultural land proposed for built (hard) and soft end uses, except agricultural land to be retained in arable use, is required permanently for the construction of the development.
- 17.23 The ES states that 31.3Ha of Best and Most Versatile (BMV) agricultural land would be permanently lost. This would comprise 11.0Ha of Grade 2 and 20.3Ha of Subgrade 3a. The ES states that the significance of the permanent, adverse effect of constructing the proposed development on approximately 31.3 ha of Grade 2 and Subgrade 3a agricultural land is assessed as being major adverse - significant regarding the national resource of BMV agricultural land. There is no mitigation for the permanent loss of BMV agricultural land, as there would be a permanent change of use.
- 17.24 A further 45.6 hectares of Subgrade 3b agricultural land is required permanently for the proposed development and is assessed as being minor adverse - not significant regarding the national resource of BMV agricultural land.

#### *Objections*

- 17.25 Third party objections have been raised relating to the extent of loss of the agricultural land and that the case for development of this finite resource is not strong enough to justify approval of the application.

#### *Officer Conclusions on Agricultural Land Quality and Soils*

- 17.26 The applicant argues that there is a locational need for the proposed development which has made the 31.3Ha loss of BMV land unavoidable and that on this basis there should be no perceived conflict with policy NH/3. Officers consider the loss of the BMV land will need to be weighed in the planning balance against the public benefits arising from the proposal, including those set out in the CfG and the locational need for the development. This notwithstanding, NH/3 requires sustainability considerations to be assessed. The location of the Expansion Land is not sustainable because of the landscape and other harm caused and because it conflicts with the Council's strategic spatial economic policies, being neither located around Cambridge, near to a larger settlement or on allocated land. As such, the proposal cannot satisfy the full requirements of LP policy NH/3 and would be in conflict with NPPF par. 170. This is despite the Sustainable Transport Strategy put forward by the applicant.
- 17.27 The ES predicts that construction of the development has the potential to have a temporary adverse effect on more than 113,750 sq.m of soil (topsoil and/or subsoil). Soil resources on-site will need to be safeguarded for re-use in residential gardens, landscaping and amenity areas as part of a Soil Resource Plan which is proposed to be secured by condition and which will form part of future CEMP's.

## **18.0 S106 Obligations**

- 18.1 The Community Infrastructure Levy Regulations 2010 have introduced the requirement for all local authorities to make an assessment of any planning obligation in relation to three tests. If the planning obligation does not pass the tests then it is unlawful. The tests are that the planning obligation must be:
- (a) necessary to make the development acceptable in planning terms;
  - (b) directly related to the development; and
  - (c) fairly and reasonably related in scale and kind to the development.
- 18.2 The applicant has indicated their willingness to enter into a S106 planning obligation in accordance with the requirements of the Council's Local Plan and the NPPF.
- 18.3 Policy TI/8 'Infrastructure and New Developments' states that Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms. The nature, scale and phasing of any planning obligations and/or Community Infrastructure Levy (CIL) contributions sought will be related to the form of the development and its potential impact upon the surrounding area.

### Heads of Terms

- 18.4 The Heads of Terms (HoT's) as identified are to be secured within the S106. The HoT's list identifies the specific S106 obligation that is sought by category. Contributions and their respective triggers have yet to be agreed as a complete package and these are for the most part excluded from the HoT's as they are still subject to negotiation.
- 18.5 The HoT's are split into key topics as identified below, each of which has been justified and explained in detail as part of its corresponding section in this report and is considered to be CIL compliant. The HoT's are as follows:

### **Transport**

#### Travel Plan (TP)

- Site-wide TP
- Individual TP's
- Appointment of site wide TP Manager
- Event Management Plans
- Targets for all mode shares
- Targets for reducing the percentage of peak hour vehicular trips
- Establishment of car club and car share schemes
- Monitoring and review
- Establishment of a Transport Review Group
- Travel Plan Contingency Fund

#### Car Parking and its Management

- Car Parking Management Plan
- Agreement and phased review of car parking ratios to achieve TP targets and reflect future mobility trends

#### Rat Running and Off-Site Parking

- Monitoring Strategy
- Monitoring and Mitigation Fund

#### Walking

- Direct provision of a new section of footway connecting the A1301 (east) to High Street (west) in Hinxtton along New Road.
- Direct implementation of an A1301 improvement scheme at the A1301/ A505 junction and within the site as indicated illustratively on PP5: footways / cycleways throughout the site, connecting to the existing pedestrian / cycleway to the west of the A1301, informal and formal crossing facilities as required on the A1301 within the site, and a signalised toucan crossing facility located on McDonald's roundabout (subject to final scenario approval) as shown on indicative plans for improvements to this roundabout.

#### Cycling

- Provision of on-site Cycle Hub with maintenance facilities and cycle hire.
- Improvements to cycle routes between the Campus and Whittlesford Station.
- Provision of a new cycle connection to the north of North End Road.
- Financial contributions towards or direct provision of the following:
  - longer distance improvements in and around Sawston as part of the GCP Greenways project to cater for safer cycling routes for Campus residents and Campus employees to and from Cambridge;
  - stud lighting on the existing cycle route from Whittlesford to Sawston to cater for any cycling demand from secondary children cycling to Sawston via Whittlesford from the site; and
  - cycle improvements from Saffron Walden towards Great Chesterford and the Campus.
- Facilitation of access across the A11 arising from NUGC as a development requirement if the proposed NUGC allocation comes forward.
- In the event that AgriTech is granted planning permission, provision of a cycleway / path connection on the east side of the A1301 to connect to the AgriTech shared pedestrian / cycleway from Tichbault Road.

#### Bus and Rail

- Public Transport Strategy including:
  - Shuttle Bus service enhancement
  - Campus Bus Services: Expansion and improvement in capacity

- Off-Peak Bus Services All: Provision of appropriate off-peak services subject to demand
- Provision of school shuttle services to Sawston VC subject to CCC statutory requirements
- Local Access: to make the site bus services available for use by the local community (subject to registration / licencing / demand)
- Businesses: Coordination of bus services with nearby business parks

#### Highway Improvements and Access

- Access and A1301: Direct delivery of improvements and access points within the site.
- A505 / A1301 'McDonald's Roundabout': Direct implementation of signalised mitigation, alternative scheme or financial contribution to an equivalent proportionate cost.
- Moorfields Road and Hunts Road: Direct implementation AgriTech scheme or scheme to be agreed or financial contribution to an equivalent proportionate cost.
- A11 / A1307 junction and Bourn Bridge Road / Granta Park access:
  - direct implementation of A11 SB on-slip white lining; and
  - financial contribution towards the CSET's Travel Hub.
- M11 southbound off-slip – junction 10:
  - (Mitigation as per Highways England requirements secured either through S106 or planning condition, issue delegated to officers).

#### Transport Enhancement Fund

- Establishment of Transport Enhancement Fund towards future enhancements to the sustainable network, such as but not limited to:
  - Whittlesford Parkway Station Masterplan Improvements; and
  - Enhanced off-road cycling connectivity to Whittlesford Parkway station.

#### **Housing**

- 30% Campus 'affordable' housing
- Campus Related Worker provision
- Operation of Housing Waiting List
- Operation of a Sales and Lettings Policy

#### **Education**

##### Population Monitoring

- Residential population
- Early years (0-3)
- Primary (4-10)
- Secondary (11-15)

##### Pre-School

- Provision of an early years facility in two phases: first phase provision of a 60 places (315 sq.m), extended to a second phase to provide 120 places (490 sq.m). Reserved land for up to 500 sq.m.

### Primary

- Provision of up to 2FE primary school on site, 2.3ha land transfer, phased financial capital funding, phased provision based upon anticipated demand and need with CCC delay notice, fall-back contribution scenario and review mechanism.

### Secondary

- Contributions towards a 1FE (150 place) expansion of Sawston Village College.

### **Health**

- Land safeguarded for 500sqm Health Facility.
- Off-site contributions to identified health facility improvements (matter to be delegated to officers to resolve following conclusion of CCG advice).

### **Indoor Community Facilities**

- Community Development and Support Strategy (CDSS) including review mechanism to secure:
  - Outline specification and provision of permanent community hall of no less than 335sqm + ancillary facilities and capable of accommodating one full size badminton court no later than occupation of the 500<sup>th</sup> residential unit or as otherwise agreed. This should be located within the site and could form part of a multifunction education and community space.
  - Temporary community facility to be agreed and provided prior to first occupation.
  - Contribution towards community meeting facilities in Hinxtton Parish including land and / or recreational facilities for recreational purposes (terms to be agreed and delegated to officers).
  - Library: Fitting out of space within the permanent community hall for on-site library provision (final inclusion of HoT's to be delegated to officers).

### **Community Development**

- Direct provision of £292,065 resource towards specialist community support.
- Direct provision of £94,250 resource towards general community development support.
- £20,000 resource support through grant funding for community-led initiatives on site administered through the SCDC Community Chest (small grants scheme).
- Apprentice Construction Strategy.

### **Community Facilities: Access and Management**

- Access and Management Statements for each of the following facilities / uses:
  - Community hall
  - Cultural visitor facilities (D1 uses)
  - Indoor leisure facilities (D2 uses)
  - Outdoor sports pitches and changing facilities
  - Allotments
  - Educational facilities (where shared facilities such as sports facilities or community space might be provided)

### **Estate Management**

- Detailed Estate Management Plan

### **Open Space**

- Provision in accordance with adopted standards
- Open space management
- Open space access
- One full size (106m x 70m) 3G all-weather pitch to Sport England standards and one locally equipped area of play (LEAP) no later than occupation of the 50th dwelling

### **Waste**

- Contributions towards waste vehicles
- Contributions towards bins

### **Scheme Phasing**

- No more than 90,000sqm Research and Translation floorspace occupied until Campus Related Worker population reaches 500.
- No more than 110,000sqm Research and Translation floorspace occupied until Campus Related Worker population reaches 1000.
- No more than 130,000sqm Research and Translation floorspace occupied until Campus Related Worker population reaches 1,500.

## **19.0 Other Matters**

### Financial Motivation

- 19.1 Many objectors have raised this as an issue but the financial motivation of Wellcome in pursuing the application is not a material planning consideration.

### Equalities Act

- 19.2 The application has been assessed against the relevant sections of the Equalities Act 2010, and it is not considered that the application discriminates against people with protected characteristics specified in the Act. The protected characteristics are:

- age
- gender reassignment
- being married or in a civil partnership

- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

## **20.0 Planning Balance**

- 20.1 Planning decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (section 70(2) of the Town and Country Planning Act 1990 and section 38[6] of the Planning and Compulsory Purchase Act 2004).
- 20.2 A planning decision to approve the outline application would constitute a significant departure from the development plan. The NPPF, para. 12, advises that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making; where a planning application conflicts with an up-to-date development plan permission should not normally be granted.
- 20.3 The application is assessed by officers as being contrary to the development plan as a whole, in recognition of the conflict primarily with its spatial economic policies. The need for the exception and how officers have assessed this is primarily focused on the CfG and the national economic, health and educational benefits that would arise as a result of the proposal. These benefits are put forward by the applicant and arise from their vision:
- 20.4 *'to build on the scientific foundations of the campus to become the international centre for scientific, business, cultural and educational activities emanating from Genomes and Biodata'.*
- 20.5 The potential benefits arising from the proposal as described by the applicant need to be robustly considered and weighed against the inherent conflict in principle of the development of the Expansion Land with the adopted Local Plan's spatial economic policies and the harm to landscape, the setting of heritage assets and the permanent loss of 31.3 ha of best and most versatile agricultural land that would arise from the development as a whole and which has been identified by your officers. As part of this balancing exercise, the extent to which the potential public benefits of the proposal outweigh the (less than substantial) harm to the significance of heritage assets, as identified above, will need to be assessed.
- 20.6 Section 2 of the NPPF lists the three dimensions to sustainable development: economic, social and environmental. These roles are interdependent and need to be pursued in mutually supportive ways to achieve sustainable development. These roles will now be considered in weighing up the benefits and dis-benefits of the proposed development, relative to all material considerations discussed in this report.

### **a) Environmental Impacts**

#### *Location*

- 20.7 The development of the Expansion Land would represent an unsustainable location contrary to the SCDC Local Plan (2018) spatial and employment strategy and policies S5, S/6, S/7 and E/9.

#### *Landscape*

- 20.8 The development of the Expansion Land would be harmful to the local landscape character and visual amenity. Its footprint and proposed building heights could not be fully mitigated. The character of the A1301 would be urbanised with buildings appearing prominent. The development of the Expansion Land would introduce a substantial block of new urban development onto an area of gently rising ground in a currently open arable, strongly rural landscape. This part of the rising chalkland landscape is sparsely developed, dark at night and provides a foil to the attractive setting of the villages which sit alongside the lower edge of the Cam. The development of the Expansion Land would signify a marked change in the presence of the Campus within the landscape (by day and by night), to one of visual prominence. Harmful effects would arise in respect of landscape character and visual amenity contrary to SCDC Local Plan (2018) policies HQ/1, NH/2 and SC/9 and NPPF paragraphs 127 and 170.

#### *Heritage*

- 20.9 The development of the Expansion Land would result in a high degree of 'less than substantial' harm to the significance of Hinxton Conservation Area and a degree of 'less than substantial' harm to the significance of Hinxton Parish Church of St Mary & St John the Evangelist (Grade II\*), Ickleton Parish Church of St Mary Magdalen (Grade I), Ickleton Conservation Area, and to a lower degree Hinxton Hall (Grade II\*), due to inappropriate development in their setting. The proposal conflicts with SCDC Local Plan (2018) policies NH/14, SC/9 and HQ/1 and as a result of this harm requires clear and convincing justification to be weighed against the public benefits of the proposal as required by the NPPF paragraphs 194 and 196.

#### *Protecting Agricultural Land*

- 20.10 The development of the Expansion Land would result in the permanent loss of 31.3 ha of best and most versatile agricultural land. The Expansion Land is not allocated for development and for the proposal to be policy compliant, sustainability considerations and the need for the development must be sufficient to override the need to protect the agricultural value of the land. In terms of sustainability, the proposal runs contrary to the Council's spatial economic policies and causes landscape, heritage and agricultural harm. Whilst a Sustainable Transport Strategy could be put in place to mitigate the development, the site is inherently unsustainable. The proposal therefore conflicts with SCDC Local Plan (2018) policy NH/3 and NPPF paragraph 170.

#### *Design and Layout, Open Space and Biodiversity*

- 20.11 The design and layout of the site has been developed to enable a single cohesive Campus to function. The layout responds to existing planning constraints and context whilst also delivering employment floorspace, housing units and supporting uses to fulfil anticipated needs. The development would contribute to a net gain in biodiversity, provide protection of important habitats and species and deliver a significant extent of open space which would form part of an open Campus environment that employees, future occupants and existing residents would be able to access and benefit from. Subject to appropriate conditions and

controls, including a Design Guide, the proposed development would be likely to provide an exemplary environment for healthy living and working.

#### *Other Environmental Considerations*

- 20.12 The transport, water, utility, sustainability and energy impacts, their mitigation and supporting strategies for delivery would be secured through a comprehensive set of S106 measures and planning conditions. The amenity of existing residents, particularly those in Hinxton and surrounding villages would be impacted. A comprehensive set of controls concerning construction would be put in place to limit harm from construction activities, including construction environmental management plans and community liaison.

#### **b) Economic Impacts**

- 20.13 The existing Campus is part of this Country's existing life sciences national infrastructure. The unique and specialist nature of the work undertaken at the Campus, its existing successful establishment, the anchored institutional research base and the evidence of future demand for significant floorspace (44,000sqm), weigh in favour of the proposal. In the last 12 months the Wellcome Sanger Institute has generated more peta-bases of DNA sequence than the last 25 years combined and there is an urgent need to capitalise from the opportunities in the growth of genomic data through the planned expansion of the Campus which is currently full. The development is anticipated to generate 4,275 net additional jobs on site, between 8,750 - 9,225 jobs at the District level and between 11,190 - 11,790 jobs at national level.
- 20.14 The existing critical mass and associated co-locational benefits for research and innovation, business growth and associated education in the genomics sector on the Campus are location specific. Whilst part of the Cambridge Life Science cluster, the existing site can be considered a specialist cluster in its own right, with its own specific need to expand in the location proposed. There are no viable or credible alternative sites that could be realistically explored by the applicant. The specialist nature of the work undertaken at the Campus would be safeguarded into the future through planning condition.
- 20.15 The assessed quantum of global scientific and local and national economic benefits of the proposal would be unlikely to arise elsewhere in the UK to the same level. The proposal aligns with the aims of the Government's Life Science Industrial Strategy. The proposal would allow genomic and bioinformatic institutions and businesses to locate to the site, to invest and expand and adapt. It would allow the Campus to build on its existing strengths, continuing as a world leader in genomics and expand its ecosystem allowing research to be translated into commercial activity. The proposal aligns with the NPPF para. 80. The need is urgent, the growth opportunity significant and the applicant cannot wait for the review of the emerging SCDC LP. There is a significant risk that economic benefits likely to arise from the proposal to the UK would be lost overseas if not realised on this site through this application.

#### **c) Social Impacts**

##### *Health*

- 20.16 The Campus is the world's leading centre for genomics research, having played a central role in the Human Genome Project (1990-2003). Since the site's establishment £3.2 billion has been invested to-date in discovery research on the

Campus. On-going research in Genomes and BioData from the expanded site would influence new forms of clinical assessment and treatment. The growth of the Campus eco-system would allow for increased opportunities arising from further innovation, translation, clinical application and commercial activities to take place. It is not possible to quantify the health benefits that would arise but the near future is a genomics-enabled National Health Service and the development of the site would contribute towards and likely play a vital role in helping deliver transformative health care in the UK but also globally. The application is a unique opportunity to take advantage of the growth in genomic research and arises from a site which is already considered part of the life sciences national infrastructure. The application would allow for the longer-term potential for further requirements for institutions such as those being promoted through the Life Sciences Industrial Strategy and to accommodate the work of the NHS on patient data, biodata and genomics. The potential health benefits arising from the application are significant given the unique nature of the site. Not supporting the scheme would mean that the potential health benefits to society may not fully arise because the co-locational advantages of developing this specialist cluster could not be achieved to the same extent anywhere else in the UK.

#### *Culture and Education*

- 20.17 The vision for the expanded Campus includes becoming the international centre for cultural and educational activities emanating from genomes and biodata. The educational and cultural opportunities associated with the potential expansion of the Connecting Science programme run by Wellcome is a key part of the CFG. A conferencing facility of 5,000 sq.m is envisaged to allow for the Connecting Science programme to expand. It would provide educational support, training and disseminate the importance of genomics work to society at large. It would be likely to bring about educational opportunities to those accessing the programme, including for local schools to promote the study of STEM subjects and would help train scientists of the future from the UK and abroad. These are significant benefits.

#### *Housing*

- 20.18 The proposed housing is primarily put forward to support the economic case for the proposal to help it compete for international investment, to attract and retain talent and to provide a living and working scientific community. The housing would include the provision of 30% Campus 'affordable' housing. The nature of the housing being put forward is bespoke to the unique nature of the application and as such it would not meet the wider housing needs of the District or constitute affordable housing which would meet the District's needs as per policy H/10. The nature of the housing offer put forward would mean that it would be built only for Campus Related Workers and managed in way that meets their needs, including employees on lower incomes. The risks of the housing not meeting this need would be minimised through the S106.

#### *Community Infrastructure and Supporting Uses*

- 20.19 Community, educational and health demands arising from the application would be monitored and met through the provision of on and off-site facilities, community support and planning contributions. The scope of the social infrastructure and supporting uses to be provided would benefit future Campus residents, employees and the public. The community infrastructure and the Campus would be accessible to the wider community for access on the terms set

out in the application and this, together with specific mitigation for the community of Hinxton, would be provided and secured through the S106. The specific mitigation for the Parish of Hinxton is to be secured towards its village hall and associated improved and / or extended recreational space and the resolution of this required obligation is requested to be delegated to officers.

## **Overall**

- 20.20 Harm would arise from the conflict with the spatial and employment strategy of the local plan, the significant and demonstrable harm to the landscape, harm to heritage assets to which considerable weight and importance must be given and harm resulting from the loss of a significant extent of agricultural land. In these respects, the proposal fails to accord with those LP policies as set out above. This results in conflict with the development plan as a whole and this conflict should be given substantial weight.
- 20.21 However, the proposal would result in significant economic benefit both locally and nationally, would provide opportunity for significant health benefits to society to arise and provide a platform for the site to become the international centre for cultural and educational activities emanating from genomes and biodata. The proposal is needed urgently, the Campus is currently full and could not be located elsewhere in the UK.
- 20.22 The need for the development and benefits arising must clearly outweigh the conflict with the development plan in order provide a justifiable basis to grant permission. In officers' view, whilst recognising the significant harm caused and obvious policy conflicts derived from this proposed development, having regard in particular to the CfG and the urgent economic need for the development in the location proposed, these other considerations outweigh the substantial level of harm identified. The proposed development would bring about significant economic and social benefits in the national interest.
- 20.23 The balance of these benefits in the circumstances of this application weighs in favour of grant of planning permission and outweigh the conflict within the development plan and the harm that in landscape, heritage and agricultural terms the development would cause.

## *Heritage*

- 20.24 The statutory considerations to which the local planning authority must have regard and the national and local policy considerations have been set out at the beginning of the Cultural Heritage para. 14.1 (page 90) of this report. The Council's Heritage Officer has identified a high degree of 'less than substantial' harm to the significance of Hinxton Conservation Area and a degree of 'less than substantial' harm to the significance of Hinxton Parish Church of St Mary & St John the Evangelist (Grade II\*), Ickleton Parish Church of St Mary Magdalen (Grade I), Ickleton Conservation Area, and to a lower degree Hinxton Hall (Grade II\*), due to inappropriate development in their setting.
- 20.25 Great weight and importance must be attached to this harm to heritage assets. The proposal is in conflict with policies NH/14, SC/9 and HQ/1 and the starting point in considering the proposal in accordance with section 66(1) and section 72(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 and national policy relating to applications affecting heritage assets is that there should be a strong presumption to refuse planning permission unless there are public benefits which outweigh the level of harm identified.

20.26 The public benefits which officers consider outweigh the level of harm to the heritage assets identified include:

- National economic benefits;
- Health benefits to society; and
- Educational and cultural benefits.

20.27 The potential level of benefit arising from each of these three aspects is set out in the CfG and summarised above. Officers have assessed the potential of these benefits and conclude that they amount to significant public benefit. The level of public benefit provides clear and convincing justification to accept the level of harm that would arise to the identified heritage assets.

#### *Summary Conclusion*

20.28 Having taken into account the provisions of the development plan, NPPF and NPPG guidance, the statutory requirements of section 66(1) and section 72(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, the views of statutory consultees and wider stakeholders, as well as all other material planning considerations, the proposed development is recommended for approval subject to referral to the Secretary of State, planning conditions, the completion of a satisfactory S106 planning obligation and reasons for approval as set out below.

### **21.0 Recommendation**

21.1 Under the Town and Country Planning (Consultation) (England) Direction 2009, where a Local Planning Authority proposes to approve retail, leisure or office use development which is to be carried out in an out-of-centre or out-of-town location and is not in accordance with one or more provisions of the development plan in force in relation to the area in which the development is to be carried out, there is a requirement (based on floorspace) for the application to be referred to the Secretary of State before any permission can be issued. The Secretary of State has the power to call-in the application for his own determination. Since the proposed development falls within the call-in criteria, the application will be required to be referred to the Secretary of State under this Direction if Members of the Planning Committee are minded to support the officer recommendation.

21.2 The recommendation is as follows:

#### **APPROVAL of the outline application subject to:**

- a) Consultation with and confirmation from the Secretary of State that the application is not to be called in for his determination;
- b) The planning conditions as set out at appendix A, with the final wording of any significant amendments to these to be agreed in consultation with the Chair and Vice Chair prior to the issuing of planning permission;
- c) Satisfactory completion of a Section 106 Agreement which includes the Heads of Terms (HoT's) as set out in the report, and any other HoT's or the detail including phasing and triggers, that are still under negotiation. The final wording of any significant amendments to the HoT's listed in the report to be agreed in consultation with the Chair and Vice Chair prior to the issuing of planning permission; and

- d) Delegated authority given to officers to set out as part of the decision notice and in accordance with the Town and Country Planning (EIA) Regulations 2017, reg. 29 'information to accompany decisions' a reasoned conclusion of the significant effects of the development on the environment and to carry out appropriate notification under reg. 30 accordingly.

**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 Plan 2018
- South Cambridgeshire Local Development Framework SPDs

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