

## Appendix J, South Cambridgeshire District Council Responses

### Ecology Officer

#### Original Comments

Amendment and Clarification Required.

#### Amendment Comments

In general, the additional information provided in QUOD letter reference Q080835.CO04.HP dated 23rd August 2019 and the updated Biodiversity Net Gain calculations using Defra Metric V2.0 are welcomed.

Revised parameter plans are not considered to be an absolute requirement as sufficient information is provided in the updated Design and Access Statement Addendum and Development Principles. The updated plan showing the location of badger sett entrances (active and inactive) is welcomed. **Please do not make this publicly available as this information should remain confidential.**

Retention of the badger setts on the campus and northern retained woodland block are realistic within the scheme parameters. Although badger sett entrances in the southern block appear to be within 20m of the developable area as shown in parameter plans, Development Principle 12.3 clearly states that '*Built development will be set back at least 20m from badger setts, with a target of 50m where possible*'. Therefore, careful design will be required in the southern area, particularly along the eastern edge of the southern woodland block. The letter states that '*A protection zone will be clearly marked and be provided with any relevant Reserved Matters Applications*'. This information will need to be secured through a condition for a Construction Ecological Management Plan (CEcMP).

Update badger surveys (including methods such as bait marking and use of trail cameras if required) will be needed at each stage of the development to define badger mitigation requirements.

Detailed design for the Reserved Matters application will need to clearly demonstrate that the following has been considered and incorporated in the scheme in relation to badgers:

- Primary function of green space to provide biodiversity connectivity in accordance with commitments in the update letter;
- 20m+ buffer zones retained undisturbed from active badger sett entrances (including protection from enabling work, landscaping, etc.);
- Retention/precautionary approach for inactive badger sett entrances;
- Connected foraging habitat and suitable vegetated dispersal corridors for badger to be a priority within green infrastructure in accordance with commitments in the update letter;
- Details of connectivity measures such as badger tunnels to be provided; and
- Appropriate long-term habitat and landscape management to maintain and create badger habitat.

Recommended Conditions and Informatives
A site-wide Construction Ecological Management Plan, including updates to surveys prior to submission of key phase RM's
Habitat Management Plan for all semi-natural, created, enhanced, and retained habitat. This must include comprehensive habitat establishment parameters, and habitat management strategies able to roll forward for at least 25 years
Measurable biodiversity net gain
Green and brown roof installation parameters
Integrated bat and bird boxes in 50% of dwellings, reptile and amphibian hibernacula, hedgehog connectivity, and features such as insect hotels

## Environmental Health

No Objection: The Env. Health Team has reviewed the relevant sections of the Environmental Statement (ES) and supporting documents. The following environmental health issues / health determinants need to be considered and effectively controlled in order to protect the quality of life / amenity and health of proposed and existing residential uses / premises and the wider community / environment and which are paramount in facilitating a sustainable high-quality development:

### *Air Quality*

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. A low emission strategy condition is recommended.

#### *Contaminated Land*

The ES Non-Technical Summary confirms the outcome of the EIA Scoping report regarding ground conditions and contamination in that it was one of the subjects not considered likely to give rise to significant effects. A Preliminary Risk Assessment has been submitted to support the Ground Engineering Desk Study November 2018. The outcome of the Preliminary Risk Assessment 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*

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. A range of conditions and informatives are recommended to control: earthworks; site wide phasing; construction impacts; hours of construction/delivery; bonfires/burning; noise assessment/mitigation; and noise insulation.

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

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

#### *Odour*

Concerns regarding the adverse impacts from odour generated by operations at the small sewage works to the south-west of the application site are raised. The Environment Agency indicates this waste treatment plant 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.

Development 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 in Development Area 2 enabling retro fitting of odour abatement plant at a latter date if found to be necessary.

This could be consideration of allowing for (but not necessarily providing at the outset) the ability to introduce air-handling units to provide air conditioning to the buildings, where the intakes may be of sufficient height or location to draw air from

less odorous locations/facades or heights. Such units could incorporate filtration and odour control components. An odour assessment for buildings in Dev. Area 2 is recommended as a condition.

### *Artificial Lighting*

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*

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*

To meet renewable energy requirements, it is concluded that the technologies considered viable for the site are: solar photovoltaic panels; solar hot water heating; ground source heat pumps; and air source heat pumps (ASHPs). These technologies may be considered in isolation but may also be considered as part of a mix of technologies used on-site. 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.

### *Other Advice*

A condition is recommended requiring adherence to the mitigation measures set out in the Environmental Statement.

Recommended Conditions and Informatives
Low emission strategy
Unidentified contamination remediation informative
Earthworks plan
Site wide phasing plan
Outline construction environmental management plan

Detailed construction environmental management plan
Construction and demolition hours
No bonfires or burning of waste
Noise assessment and mitigation schemes for residential properties
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
Environmental statement mitigation

## **Landscape**

### Original Comments

Objection: a detailed consultation response objecting to the application on the grounds of landscape and visual impact is provided by the Council's appointed external landscape consultants Huskisson Brown Associates (HBA). Note HBA expert advice was also sought in relation to the AgriTech application and subsequent appeal inquiry.

### *Summary*

This is recognised as a particularly important development proposal. Nevertheless, it is a proposal that would be very harmful to the local landscape character and visual amenity. The development is simply too extensive and contains built form of such scale and height that it could not be successfully mitigated over time. It is not considered that the project has been sufficiently strongly landscape led. However, that is not to say that a scheme of this size could be appropriately bedded into this landscape in any event.

The treatment of the A1301 corridor through the site, a fundamental part of the proposal, is a major concern and its effect on the quality of the spaces to be created adjacent to it and its successful incorporation /integration into the campus are

questionable. 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.

On the positive side, if the Wellcome Trust 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, throughout the entirety of the red line site, a high standard 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.

The proposal would introduce a substantial block of new urban/suburban 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, parts of which would be 20m high.

HBA consider that there would be significant residual landscape and visual harm. The scheme cannot be supported on account of the harmful effects that would arise on landscape character and visual amenity contrary to guidance in NPPF, SCDC LP Policy HQ/1, and NH/2. It may also conflict with SC/9.

#### *Summary of Detailed Comments*

Concerns are raised in relation to:

-Direction of effects: HBA consider some parts of the assessment mask the effect.

-LVIA landscape characterisation: arbitrary, unjustified, coarse grained resulting in a moderation of the landscape impact and contains omissions.

-Construction effects (landscape): clarification sought regarding phasing and worst-case assumptions.

-Visual effects from construction (Hinxton): views for the local community of Hinxton, which the ES has ranked as 'Minor – Moderate adverse' (and therefore not significant) is questionable. The visual effect on the local community of Hinxton is under-reported.

-Visual effects from construction (Coploe Road): There are no other locations which afford such a rich context view over the Cam Valley as the river emerges into the lower lying SCDC countryside from the higher Essex plateaux land. Whilst the motorway is a detractor, the settlements of Ickleton and Hinxton are marked out by their church spires punctuating the valley floor. The existing Campus buildings are reasonably well located in the lower valley and largely contained by vegetation although some roofs and point features are discernible. HBA do not agree with the ranking given in the ES and consider that a ranking of Moderate adverse (and therefore significant) effect should apply.

- Visual effects operational stages: suffer from the same issues identified for the construction effects i.e. under records effects.
- Roadside hedges: the implications on the existing mature hedgerow is unclear.
- Retained features: Over-reliance on the effect of these and of increases in tree numbers on site post development given that the application is in outline form. A more precautionary approach to the LVIA should have been undertaken overall. Numerous examples demonstrating this are given by HBA and inconsistencies raised regarding the LVIA assessment are provided. Overall, HBA state that the LVIA contains conflicting assertions that have skewed the findings and that more significant adverse visual effects are likely to arise than have been acknowledged in the ES.
- Soils: Inconsistencies in calculations raised but nonetheless there will be a substantial excess of topsoil from the development. Reconciliation with Defra Code required.
- Bunds: Bund A, in particular, would appear alien. This feature is shown with both faces being proposed at slopes of 1 in 4 and about 6.0m above existing ground levels. The bunding profile should be reviewed.
- Lighting: The assessment has failed to include the overlooking and longer distance views, such from Viewpoints 7, 10, 11,12 and 17, where it would seem clear that the lit footprint of the site would be a clearly discernible change.
- PP1: Development Areas 1 and 3 abut too closely and the objective of reflecting the valley landform as an open space flowing between the two areas will be obscured.
- PP3: Lacks any meaningful link to information clarifying exactly what is envisaged would be provided and should be amended to reflect the DAS. The Development Specification requires revision including outline planting specifications and is too loosely drafted. HBA question whether PP3 gives SCDC sufficient comfort as to the acceptability, quality and standard of the Green Infrastructure proposed, although it is accepted that this would not necessarily prevent reserved matters applications coming forward that could provide an appropriate standard.
- PP5: The limit of deviation for the A1301 works is too tightly drawn.
- Dev. Specification: Various amendments to this document are recommended.

Recommended Conditions and Informatives
Advance planting, early planting and temporary retention of residual planting including interim management and methodology re transplanting
Interim management of existing in-situ landscape features until incorporated into overall scheme
Lighting

Phasing of landscape structure planting/ associated landform
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### Amendment Comments

#### Objection Maintained

-Reduction in maximum height to 11m for area within Development Area 1, near Hinxtton: This amendment is of only local benefit but the adverse effects on the change in visual character of A13101 would not be materially reduced.

-Removal of the maximum 20m height zone within Development Area 1: The proposed omission of any 20m high development in the context of the proposals as a whole, whilst being welcomed, does not materially change the adverse landscape and visual effects that would arise.

-Adjustment to the proposed A1301 road alignment – which has been reduced in width. The change does not assist in softening the appearance of the road corridor.

-Reduction of the setback distance for Development Area 1 from the eastern side of the A1301 to allow a 7 m distance between the carriage way of A1301: This has resulted in the footprint of Development Area 1 extending slightly closer to the A1301. The visualisations present a very stark impression, see Fig10.1f and 10.1g.

-Inclusion of a new access route for informal pedestrian and cycles from Tichbault Road to Development Area 3: This is a sensible idea.

-Revision to the semi-natural open space to allow outdoor sports in two defined areas to the Parameter Plan 3: Green Infrastructure Plan: There is a concern about the potential for artificial surfacing / lighting / fencing in this sensitive frontage.

-Replacement Volume III – Visualisations: It is updated and three new viewpoints in are provided: The additional viewpoint from the Icknield Way Trail confirms the sensitivity of the proposals from the Coploe Hill direction.

#### *Other points*

-HBA remain concerned with the topography plan which still has side slopes that are uncharacteristic of the area

-HBA remain of the view that there is a disconnect between PP3 and the biodiversity considerations.

#### *Conclusion*

The revised / amended information does not make a material difference to the recommendation set out in HBA's initial consultation response. This remains a very

damaging proposal in terms of the landscape and visual effects that would arise and which could not be appropriately mitigated.

### **Development Officer (Health and Wellbeing)**

No Objection

#### Original Comments

The outcome of the Health Impact Assessment as submitted has been assessed as grade B. Grade B meets the required standard of the HIA SPD policy.

Whilst the HIA has included the health profile of the locality and existing campus workers it has not identified any vulnerable populations which could potentially be affected by the proposed site. As a result, the impacts on health across the different populations and any causal pathways have not been evaluated.

The Campus will attract multi-cultural employees from across the Globe including non-English speakers with different religions/beliefs, short term contract workers, young families, and those from the LGBT communities, as well as older residents living in established communities nearby. The report is not explicit in identifying these groups and describing the distribution of health impacts and degree of severity, both positive and negative across these groups. Additionally the level of commitment to deliver some of the mitigating measures is vague – a clearer commitment to mitigate for the identified negative impacts is also sought.

#### *Housing Quality & Design*

It is recommended that each new dwelling has an EV charge point in readiness for the government deadline of 2040.

#### *Access to healthcare services and other social infrastructure*

S106 contributions may be sought towards healthcare provision (as already covered in the report) but specifically in respect of community health services to protect against poor mental health associated with the “new town blues”. There is concern that due to the international and transitory nature of the campus, residents and their families may be at greater risk of feeling isolated and lonely, creating greater demand for specialist mental health support services.

In the absence of a primary school, S106 contributions should be sought for the early delivery of a community building to facilitate community connections as the first residents move in.

#### *Access to open space and nature*

Cycle ways should be built in conjunction with the road infrastructure to promote the use of active travel at the very outset and the road-hierarchy should prioritise cycle paths across roads.

### *Accessibility and active travel*

It is pleasing to see that residents will be encouraged to adopt public transport, cycling and walking as the preferred mode of transport via the existing Travel Plans and that inclusive design is part of the overall design strategy. It is recommended that the features from the (tfl) Healthy Streets checklist are also incorporated to enhance the public realm.

### *Access to healthy food*

Café/restaurant facilities are encouraged to obtain the Cambridgeshire County Council “Healthier Options” award scheme. Options for healthy on-site catering for construction staff would also be welcome.

### *Access to work and training*

Opportunities to explore construction training or apprenticeships for local residents could be sought with local colleges.

### *Social cohesion and lifetime neighbourhoods*

It is pleasing to see that the Campus expects to meet the Lifetime Neighbourhood standards and plan to embed the principles of the WELL Community Standard into the design of the community.

### Amendment Comments

The Health Impact Assessment ‘addendum’ report has been assessed. All points initially queried have been addressed and the officer is satisfied that the impacts have been considered and will be confirmed within a statement of compliance at the Reserved Matters stage.

### **Historic Buildings Officer**

Objection

### Original Comments

The proposed Expansion Land development will cause a high degree of ‘less than substantial’ harm to the significance of Hinxtton Conservation Area. The proposed Expansion Land development will also cause a degree of ‘less than substantial’ harm to the significance of the Parish Church of St Mary & St John the Evangelist, Hinxtton (Grade II\*), the Parish Church of St Mary Magdalen, Ickleton (Grade I), Ickleton Conservation Area, and to a lower degree Hinxtton Hall (Grade II\*), due to inappropriate development in their setting.

The proposal is in conflict with Local Plan Policy NH/14 and the NPPF para. 193. The Planning (LBCA) Act 1990 s.66(1) directs the local planning authority to have special regard to the desirability of preserving a listed building or its setting.

The proposed development primarily affects the setting of built heritage assets with indirect rather than direct effects.

Setting is the surroundings in which an asset is experienced. Views of or from an asset are important, and the experience of an asset in its setting is also influenced by other environmental factors (GPA3: The Setting of Heritage Assets). 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.

**Historic Landscape Setting:** There are several areas of high ground from which the historic settlement pattern along the valley of the River Cam can be appreciated. Ickleton, Hinxton, and villages onward to Cambridge are linked by the river. Ickleton and Hinxton are nestled among 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, Hinxton, are focal points and important features within their conservation areas and wider landscape. There is additional value in the grouping of these heritage assets.

Viewpoints VP5, VP7, VP11, and VP18 demonstrate the impact that development on the Expansion Site will have. Viewpoint 7, Coploe Hill has also been highlighted by both the Landscape consultant and Hinxton Parish Council. From this location there are long distance views over Ickleton and Hinxton in their landscape setting as described above, in which the development would feature prominently. The 'quantum and 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 perceived settlement pattern, and transferring emphasis from the church spires as focal points, causing harm to the significance of Hinxton and Ickleton Conservation Areas, St Mary & St John (Grade II\*), and St Mary Magdalen (which is Grade I, not Grade II\* as noted in ES Chapter 8).

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 Hinxton in their historic landscape setting. 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. In relation to St Mary & St John, ES Chapter 8 finds 'the Expansion Land contributes to the setting of the church as undeveloped agricultural land which forms part of the rural setting of the building' (Table 8.5) and that the development would 'affect appreciation of the former rural character of the area and the importance of the church as a landmark feature' (ES 8.7.6).

Viewpoint VP5 demonstrates the visual impact that the Expansion Land development will have as perceived from the heart of the Hinxton 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 Hinxton facilitates views out to open and arable land, terminating at the distant ridgeline, within the Expansion site. The Expansion Land contributes to the setting of the Hinxton Conservation Area 'due to its non-developed state and role in indicating the historic origins of the village' (ES Table 8.5). The height, density and scale of the development is such that it will eliminate the rural character of the Expansion Land with consequent effect on views east from the Conservation Area. The 1,500 new residences will have a strong urbanising impact on the setting of the Hinxton Conservation Area, detracting from the rural setting of the small, historic village. The proposed 'rural buffer' will be insufficient to adequately mitigate the impact of development and 'there is still likely to be views of the Site, additional noise and lighting' (ES 8.7.7).

Viewpoint HVP1 (Hinxton Hall) and thorough assessment within ES Chapter 8 and Appendix 8.1 demonstrate that the Parameter Massing would have no, or very limited, visibility from Hinxton Hall or in key views towards the Hall. The 'wider rural context' of Hinxton Hall will 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 Hinxton Hall, see below. Noise and Light: ES Chapter 14 (Noise and Vibration) identifies at Table 14.5 that Hinxton Hall (4), Hinxton Village (1) and Ickleton Village (6) are high sensitivity receptors, with 'little ability to absorb change without altering its present character', but assessment finds that in a worst-case scenario without mitigation, significance of effect due to construction noise will be negligible at all three receptors, as it will also be upon completion. Nevertheless, it is recommended that construction phase mitigation takes into account the above heritage assets/high sensitivity receptors.

There remain serious concerns 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 Hinxton and Ickleton (high sensitivity) will be minor adverse to negligible, but relies on the minimisation of potential lighting effects by advance landscape planting (4.21), including structural edge planting (4.17). There are separate concerns regarding the planting, see below. The 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 Hinxton Village and Ickleton Village with respect to skyglow' (4.33). 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). Night time darkness over the land around Hinxton is intrinsic to the rural character of the conservation area. Skyglow, and potentially light spill, will harm the significance of Hinxton Conservation Area, St Mary & St John, and Hinxton Hall through further erosion of the rural setting (8.7.7, 8.7.3).

Planting: There are concerns over the impact of the proposed 'planting mitigation', upon which the lighting assessment also relies. The strategy appears to be growing tall, dense hedges with the aim being to entirely screen the development in certain views. Firstly, proposals should not rely on screening. Secondly, the very tall hedges may exacerbate harm rather than mitigate. The proposed planting both fails in its aim of blocking views of the development, and also truncates and lessens the impact of

views from Hinxton to the east. This is demonstrated in VP2 (adjacent to St Mary & St John) and VP5 (High Street Hinxton). For example, Fig 10.2c shows the illustrative masterplan without planting mitigation. Buildings are shown to dominate, but there is semblance of distant views to a horizon and rising levels which aid understanding of the previously rural setting of the church. Fig 10.2h shows the illustrative masterplan with planting proposals at year 15. The tops of buildings can still be seen over the hedge, but any sense of distant views over rising land has been lost. The planting mitigation strategy should be refined to balance the impact on heritage assets.

### Amendment Comments

Objection maintained: The amendments do not address or affect the previous comments of the Historic Buildings Officer.

### **Strategic Housing Team**

#### Original Comments

Objection

Strategic Housing recognise that this is a unique innovative proposal aimed at supporting the housing needs of both existing and future Campus workers and would not therefore fit within existing policies in terms of the 'traditional' affordable housing provision. Whilst there is acceptance of this from Strategic Housing, in discussions it has always been made clear that this proposal should be considered as providing housing that is affordable to its Campus workers, rather than thinking that the development is not providing 'traditional' policy compliant affordable housing.

Within the Housing Statement December 2018, the current proposal will:

-Deliver 1,500 new homes of tenure and type to support and enable growth of the Wellcome Genome Campus.

-A mix of tenures and types of homes will be provided to include minimum of at least one third of homes for private rent with the remaining homes comprising a mix of rent and sale homes to be informed through ongoing engagement with workers and demand evidence as the development progresses.

-Up to 10% of homes will be provided as sharer accommodation.

-All new homes will be subject to sale and lettings restrictions ensuring occupation by Campus Linked Workers.

-Para 5.10 also proposes that a minimum of 30% of homes will be for sale, these will include a mix of sizes and types of homes to meet the requirements of 'Homeowners'. Availability of homes is a challenge for those aspiring to be home owners resulting in households being pushed further to the fringes of the commuting area. All the homes will be priced at open market values. Based on the research undertaken to date discounting is not necessary.

The evidence provided has been difficult to extrapolate into a defined tenure and property size need that the Housing Team are satisfied meets the objectives of the scheme. At the moment it does not appear that there will be any form of subsidised housing to support the affordability of tenures. The statement 'based on the research undertaken to date discounting is not necessary' would appear contrary to the affordability issues raised within the Housing Statement and supporting documentation. Also from a general perspective, and given that the incomes broadly reflects the overall existing population; this would certainly be at odds with the affordability analysis undertaken for Greater Cambridge.

### *Affordability*

From a recent study undertaken for the Greater Cambridge Partnership and Cambridge Sub Regional Housing Board, it identified:

-18% of households living in South Cambridgeshire have a household income of less than £20,000 – affordability options for housing include council or housing association rented properties set at LHA rates (typically 60-70% of market rent) or below.

-14% of households living in South Cambridgeshire have a household income of between £20,000 -£30,000 - shared ownership homes being affordable to people on incomes of between £20,000 and £40,000; private rents start to become affordable to people on incomes of around £25,000 or more.

-26% of households living in South Cambridgeshire have a household income of between £30,000 - £50,000 – the affordability options for this group include private rented, shared ownership and lower priced home ownership.

In comparison, the information provided in the Housing Statement, identifies the following income breakdown for those currently working at the Wellcome Trust.

- Less than 20% of Campus workers earn under £25,000
- 55% earn between £25,000 - £40,000
- £30% earn in excess of £60,000

This information is based on individual incomes from those working at the Campus and the Housing Statement states that it would be misleading to directly compare individual income to the income required to afford a home. It is therefore difficult from this information to ascertain the affordability of households working at the Wellcome Trust.

Further evidence has been submitted in terms of the survey responses, which seems to conflict with the information provided in the Housing Statement. The feedback from the survey responses (stage 3, Q.12) asks – What is your current household income?

- 10% of households working at the Campus earn less than £25,000
- 28% of households working at the Campus earn between £25,000 and £40,000

- 29% of households working at the Campus earn between £40,000 and £60,000
- 33% of households working at the Campus earn £60,000+

We can assume from this information that:

-10% of households earning below £25,000 – generally their housing options would be subsidised housing either in the form of council or housing association rented homes. The proposals that there will be up to 10% sharer accommodation will reduce the rental costs for individuals and will go some way to meet this need, although it is not clear as to how many of the 10% are individuals and willing to share. For those unable to share there does not appear to be any other housing option in the proposal available to them.

-28% of households earning between £25,000 and £40,000 – private rents, shared ownership and some lower quartile properties may be affordable to the higher end of this income bracket.

-29% of households earning between £40,000 and £60,000 – based on average open market values, those at the upper income bracket may be able to afford a lower quartile house price.

The following affordability calculation has been calculated by the Strategic Housing Team to give an overview of the true affordability in terms of incomes required to afford a current lower quartile and median average home in South Cambridgeshire.

	Rightmove Property Price Calculated*	Deposit 10%*	Annual Interest*	Repayment Period
Lower Quartile	£290,000	£29,000	3.90%	25 years
Median	£448,450	£44,845	3.90%	25 years
	Monthly Repayment*	Yearly Repayment	40% of net household income	Gross Annual Income Required**
Lower Quartile	£1,364	£16,368	£40,920	£56,500
Median	£2,109	£25,308	£63,270	£95,000
	Monthly Rent*	Yearly Rent	40% of net household income	Gross Annual Income Required**
Rents	£750	£9,000	£22,500	£28,250
	£1,100	£13,200	£33,000	£43,702

To be able to fully understand the affordability of Campus workers, information needs to be available in terms of projected household composition which will inform property sizes and an indication of property costs by size.

From the basic analysis above, it would appear that in terms of market rents, these would need to be set at between the lower level and median of market rents in order to meet the needs of those earning between £28,000 - £40,000. Those earning below £28,000 would not be able to afford a lower market rent based on the analysis above.

In terms of purchasing on the open market, those earning below £56,000 would not be able to afford to buy at current lower quartile prices and only those earning above £95,000 could afford an average median price.

Further analysis has been undertaken by the Housing Strategic Team to demonstrate what household incomes could afford in terms of a maximum open market value.

Gross	Max Property
£25,000	£170,000
£30,000	£190,000
£35,000	£210,000
£40,000	£230,000
£45,000	£260,000
£50,000	£280,000
£55,000	£310,000
£60,000	£340,000

\*Does not take into account any other outgoings, such as student loans, pensions, childcare, existing debt. Etc.

This information would suggest that some of the properties will need to be discounted to accommodate the range of income levels for Campus workers. Further work needs to be undertaken to reflect the property prices proposed by property type and tenure and how this fits with the Campus income profile.

Discussions on how the market sale homes are kept in perpetuity for Campus workers is also a concern and may not be the best fit for such a scheme, given the general transient workforce that is proposed. It is also unclear as to how lower income households will be prioritised for lower priced properties to ensure homes are available and affordable to those on lower incomes. There is a suggestion that 50% of homes would be prioritised to those on lower incomes (Housing Statement December 2018) but there has been no discussion as to how this might work and how it fits with the above analysis of affordability.

Based on the current position, we would not be able to support the proposal as we are not confident that it meets the objectives of the scheme in providing homes that are affordable for Campus workers.

### Comments on Amendments

#### Updated response to Wellcome Genome Campus Housing offer

#### Housing Offer (August 2019)

Further to my response of 7<sup>th</sup> February 2019 the Strategic Housing team have worked extensively with Wellcome Trust, Quod & planners to provide an updated Housing Offer (August 2019) that fairly meets the needs of all the campus workers. We can confirm that all our previous concerns have been addressed and we are now able to support the application.

#### Lettings and Sales Policy Update (August 2019)

There has been significant negotiations over the past few months on this policy and we believe the document is now sound and at a point where legal advice can be sought in terms of how it is structured within the S106.

### **Sustainable Urban Drainage**

#### No Objection

The proposal is an outline application and therefore it must be demonstrated that a suitable surface water and foul drainage system can be delivered on the site without increasing flood risk elsewhere.

Infiltration tests have been undertaken and have demonstrated that this is a suitable method of surface water disposal. The infiltration rate has been incorrectly calculated as the lowest recorded result of each test should be used and not an average, however as this is an outline further testing will be required in the specific location of the proposed infiltration features and this can be remedied at the time of detailed design.

Although the site is suitable for the use of infiltration, it is located on a drinking water source protection zone. This means that any water that is infiltrated must be of a quality that is not going to contaminate the underlying aquifer. Therefore, sufficient treatment of surface water run-off should be undertaken before it is infiltrated. The surface water drainage strategy has indicated an appropriate number of treatment stages that would ensure the water is of the required quality.

The calculations have also demonstrated that there is sufficient space for the storage of the required surface water run-off in the event of an extreme rainfall event. Therefore, the proposals have demonstrated that a suitable and appropriate surface water drainage strategy can be delivered on the site.

There are also issues with the capacity of the nearby Great Chesterford Water Recycling Centre, not immediately but there is not capacity for the whole build out of the development. This will mean that upgrades to the WRC will be required before later phases of the development can be constructed.

Recommended Conditions and Informatives
Surface Water SUDS
Foul Water

## **Sustainable Communities and Wellbeing**

No Objection

### *Population Calculation*

A development of 1,500 dwellings would generate a population of 4,200 based on the standard calculation of 2.8 used by SCDC for strategic development sites. The bespoke model proposed by the applicant results in a lower population of 3,201 and is agreed in principle as this is not a typical development site. As the housing mix is anticipated rather than specific at this time a monitor and manage approach is suggested to accommodate any changes to the mix.

### *Governance*

The applicant intends to maintain and manage the community facilities and spaces. It is unclear as to if a management charge will be made to residents to cover this service, however, as the development site is within the boundary of Hinxtton Parish the parish precept will still apply.

A management and maintenance strategy will be required for the long-term effective management of the site. In addition, we would expect a further strategy that sets out the full governance arrangements. Community access agreements should be agreed with SCDC and the Parish Council.

### *Open space*

The proposal includes open space in excess of that required by the policy. The common represents an excellent opportunity to create a central focal point which can be used for multi-use activities and create a sense of place. In addition to the open space requirement, the application also makes reference to courtyards in both the residential and research areas. This approach provides further opportunity to form spaces for people to connect and as such is welcomed.

The allotments and orchard will need to be built to an agreed specification.

### *Play space*

Play areas, (LAP's, LEAP's, NEAP's) with appropriate buffer zones, will be required in accordance with the Open Space in New Developments SDP. At least one (LEAP) should be available in a location that is easily accessible to the first residents. A Sports and Play Strategy and a Facilities Development Plan will be required.

### *Indoor Sport*

Reference is made in the application that up to 1,000 sqm of the hotel space could be used as ancillary space, e.g. a gym. It is hoped that this facility could be made available for use by the wider community, in addition to any provision provided on site. A fitness centre is listed as one of the possible community facilities that may be

brought forward. Any sports halls must include ancillary facilities, such as storage, welcome area, changing facilities, space for circulation, plant room and parking etc. and must be built to Sport England standard. This should be available for use by the wider community at a reasonable/affordable cost. A community access agreement will also be required. A Sports and Play Strategy and a Facilities Development Plan will be required.

### *Outdoor Sport*

Clarification is required as to what this provision will be, i.e. number of pitches and type. Consideration should be given to making at least one of the pitches an all-weather pitch, built to the latest Sport England standard and a further one an informal MUGA. Ancillary facilities will be required, in particular, changing facilities, space for circulation, plant room and parking provision. To maximise the potential use of the outdoor pitches, especially for the wider community, as outlined in the Social Infrastructure Strategy (1.12), during the winter months floodlighting will be required. A Sports and Play Strategy and a Facilities Development Plan will be required.

### *Community Space*

The community centre or hall should be a multi-use facility, for example including space for a library and faith space, as identified in Policy SC/4. The standard in the policy is for the main hall only and does not include ancillary rooms such as kitchen, store, lobby, toilets, separate meeting room and office etc. SCDC would like a flexible space, able to accommodate two Badminton Courts, to take into account possible changes of demographic over the longer term. This should be built to Sport England standards, to ensure correct ceiling heights etc.

SCDC supports the provision of community facilities at primary schools in addition to standalone, multi-purpose community centres and as such consideration should be given to this facility being co-joined with the sports pitch provision.

It is important that community space is available from the point of first occupation on site to maximise the opportunity for community development. Consideration should be given to providing temporary community space as an interim solution on the existing campus or making enhancements to local facilities to accommodate the potential for increased use. Triggers to be agreed.

A Sports and Play Strategy and a Facilities Development Plan will be required.

### *Community Development*

Much of the research into new communities has established clear links between loneliness, poor mental health and antisocial behaviours with a lack of community cohesion and social networks. Moving may isolate people from their normal support networks making them more vulnerable to everyday stresses and strains which will be more prevalent as they get use to their new surroundings.

A community development strategy will be required to outline the approach to be taken, which should include the provision of a Community Support Contribution to be paid to SCDC on an instalment basis. This is for the purpose of employing engaging and /or retaining: community workers, youth workers and sports workers or workers engaged in or carrying out activities associated with matters such as ecology and sustainability and/or health impact related matters

Recommended Conditions and Informatives
Governance arrangements
Management and maintenance strategy
Community access strategy/agreement
Allotments and orchard specification
Sports and play strategy and a facilities development plan

*S106 Heads of Terms*

Outdoor sport provision
Indoor sport provision
Children’s play space
Community facilities, permanent and temporary
Small grants scheme (community chest)

**Sustainability Officer**

No Objection: The development is considered acceptable subject to the imposition of conditions.

The application is showing 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. 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.

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. 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 an approach that is fully supported and which would be a first for the area.

-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 Design Briefs and a Soil Resources Plan, which will form part of the Construction Environmental Management Plan.

-A commitment to delivering 10% net gain in biodiversity as part of the 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.

-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 utilising the CIBSE methodology and future climate scenarios, 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, in light of criterion 3 of policy CC/3. Alongside photovoltaic panels, this heat network will help the scheme exceed the requirements of policy CC/3 for a minimum 10% reduction in carbon emissions through onsite renewable and low carbon energy. Initial calculations, based on gas fired Combined Heat and Power suggest an 18% reduction in emissions from renewable and low carbon energy, with an overall 25% reduction in emissions compared to the Building Regulations Compliant baseline.

-The use of a biophilic design workshop 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. This approach is fully supported and is to be integrated into the Design Code for the site.

-Reference to the role that Show Homes could play in helping residents understand the sustainability standards of their homes. The detail will need to be considered as part of future reserved matters applications.

-The development of a Sustainable Procurement Plan for individual buildings to reduce embodied carbon in the choice of materials.

With regards to electricity infrastructure it is noted that 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 needed, alongside reinforcement to the substation at Fulbourn and associated works to the 132 kV network.

*Additional information required*

Given the level of ambition that has been integrated into the proposals, the one area where the scheme is currently underplaying itself is in relation to construction standards for non-residential development. At present, the scheme is targeting BREEAM ‘very good’ with this level being reviewed on a building by building basis. Bearing in mind the ambitions and targets related to energy and water, there is scope for a higher level of ambition in relation to BREEAM, and would recommend that further consideration be given to the higher target of BREEAM ‘excellent’, particularly for buildings over a certain size, for example 1,000m<sup>2</sup>.

Recommended Conditions and Informatives
Sustainability statements for RM’s (including procurement plans)
Sustainability target review (5 years)
Post occupancy review (employment buildings)
Renewable / low carbon statements for RM’s and connection to district heating network
Phasing plan
Water conservation strategy for RM’s
Climate change adaptation statements for RM’s
Design code (bio-philic design)
Restorative sustainability
BREEAM

**Trees and Hedgerows**

Original Comments

No Objection

No arboricultural or hedgerow objections to the principle of the application. There are trees on or adjacent to site with legal protection through the Conservation Area and there are trees on or adjacent to site with no statutory protection.

The boundary hedgerows on the eastern half of the site would qualify as 'important hedgerows' under the Hedgerow Regulations 1997.

An Arboricultural Impact Assessment (dated December 2018) has been submitted. This document sufficient for this stage of the application but a further detailed Tree Protection Plan will be required for each following planning application.

### *Existing treescape*

As so much emphasis is being placed on the existing treescape (as well as future) a tree and woodland management plan for the site is required. A section should be included to show how felled trees and timber will be retained on site to provide material for woodpiles, dead hedges, public art, play area pieces, furniture etc.

### *Proposed treescape*

The overarching principles of the landscaping strategy are supported.

The character of the tree planting within the urban canyons should be given greater consideration given that Cambridgeshire is arid. The suggested tree planting palette is very limited and not diverse. This would be especially important in the urban area of the site where diversity gains can be made using non-native trees which suit the arid and hot environment more. Chalk soils should not limit the ability to provide a diverse treescape. It is worth noting that native trees such as birch and mountain ash which prefer damp and cool conditions are not suitable for arid and hot Cambridgeshire.

The advanced planting is welcomed but concern is raised about the irrigation given the amount, especially if larger existing trees are to be transplanted. Newly planted trees, even transplants, are very thirsty and there is no accommodation on site to provide grey water over drinking water.

Concerned about the transplanting of existing trees on site. There is no footnote that the viability of the transplantation has been investigated, both financially and final quality of tree stock. Within the 'open fields' character area, intermittent tree planting should be undertaken within the hedgerows.

The use of green roofs is welcomed.

Recommended Conditions and Informatives
Arboricultural method statement and tree protection strategy
Soft and hard landscape
Tree protection

Tree replacement
Woodland management plan

Amendment Comments

Previous comments still apply

**Urban Design**

Original Comments

No Objection: subject to clarifications and modifications - as detailed in the response – being made.

The Illustrative Masterplan and information contained in the Design and Access Statement (DAS) shows how a development of a size and nature as set out in the Description may be brought forward on the Application Site. The proposed layout demonstrates an acceptable application of established urban design and placemaking principles and promises a high-quality public realm. Subject to clarifications and modifications as detailed below, a development of this form would be supported by the urban design officer.

The Parameter Plans and accompanying Development Specification do not provide sufficient certainty on the delivery of the key design outcomes sought and illustrated.

Another key concern relates to the lack of clarity on the strategy to improve visual and physical connectivity between the proposed Expansion Land and the Existing Campus on either side of the A1301 corridor. On this basis the application is not currently supported until such time as these concerns have been sufficiently addressed.

Amendments in relation to each parameter plan and revisions to the development specification are set out in detail in the response.

<b>Recommended Conditions and Informatives</b>
A1301 scheme for RM's/design code control covering highways, landscaping and public realm works
New road detailed scheme for RM's
Design code covering the following: development areas; existing entrance; green corridors; building heights / massing / layout / orientation; pedestrian and cycle access points and routing; housing typology; and parking standards.
Phasing

## Amendment Comments

No Objection

### *Summary*

The Consultation Response to the original submission sought clarification on / modification of a number of points. Most of these points have been addressed with Parameter Plans and the Development Specification Document amended:

- Parameter Plan 1: amended to address issues raised. Now acceptable
- Parameter Plan 2: amended to address issues raised. Now acceptable
- Parameter Plan 3: amended and now provides the flexibility to introduce formal sports facilities within an area of the open space between Development Area 3 and the A1301. This is an acceptable location, providing the provision doesn't include floodlighting and high-level security fencing. The area indicated falls short of the 4.8 hectares specified to be required by planning policies. It is understood that this shortfall would be met within the development footprint at locations and to specifications to be agreed in subsequent planning stages.
- Parameter Plans 4 and 5: Raises outstanding concern about the proposed pedestrian and cycle path along the west side of the A1301 north of the Northern Access Roundabout and that the existing verge isn't sufficiently wide to accommodate a shared pedestrian and cycle path without impacting on the existing hedgerow.
  
- Development Specification: Substantially agreed. Asks for minor modification of the document regarding orientation of buildings to address and overlook the primary and secondary movement network (see Design Guide specification).

### **Waste**

No Objection

-External waste requirements - lists 360 litre bins for residual waste and recycling. This is incorrect and should be 240 litre.

-Examples of External bin store areas - shows very large bin stores - these need to be tightly fitting not large

S106

#### *Refuse Vehicles*

Additional refuse collection vehicles to service the residential expansion are required as the existing route is already up to capacity. Request a contribution of £185,000.00

*Bins*

- Standard house – 3 bins @ £75 per unit.-Flat (Based on 2 bed) - £160 per unit
- 200l for residual – (1100l bin and signage = £360 thus £65 per unit)
- 200l for recycling – (1100l bin and signage = £360 thus £65 per unit)
- 100l for organic – (360l bin and signage = £100 thus £30 per unit)

Developer to pay for cardboard skip for the moving in phase. One skip should last approximately 10 years and cost £3,500 before VAT. One skip should be sufficient. Skip to be located in Bring Bank area.

Developer to provide hardstanding within a public realm area where we can place above ground banks working roughly on the ratio of one set of banks for every 800 dwelling (as per the RECAP guide).

Power source to be provided in public realm area/s so that hydraulic banks can easily be installed in the future if needed.