

Appendix L, External Consultees and Organisations

Anglian Water

No Objection

The foul drainage from the development is in the catchment of Great Chesterford Water Recycling Centre. Although this 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.

The assessment has been based on development flows connecting direct to Great Chesterford WRC, consequently there will be not significant impact on the performance of the foul sewerage network. The infrastructure to convey foul water flows to the receiving sewerage network is assumed to be the responsibility of the developer. The detail of the connection at the WRC will be determined as the foul water drainage design is progressed.

Recommended Conditions/Informatives
Phasing plan, drainage infrastructure
Scheme for foul water drainage works
Compliance foul water drainage works

Cadent Gas

No Objection

Cadent have identified operational gas apparatus within the application site boundary. This may include a legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent assets in private land. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained from the landowner in the first instance. If buildings or structures are proposed directly above the gas apparatus then development should only take place following a diversion of this apparatus. Maps of the affected gas mains are provided.

CamCycle

Object

This is not an appropriate location for development. It is too far away from a railway station and it will not be possible to serve this location effectively with public transport in the foreseeable future. It therefore represents an unreasonable increase in motor vehicle traffic along nearby roads. More sustainable site locations are recommended, such as around Whittlesford Parkway.

A1301: Raises highway safety issues with the indicative design as a 'multi-modal' street. The A1301 should remain as a distributor road and new, local, access-only roadways should be designed as low-speed environments where people can safely walk and cycle between buildings. Any cycling infrastructure provided alongside the A1301 should follow the principles and guidance contained in Highways England Interim Advice Note 195/163. The proposal is contrary to LP policies TI/2 and HQ/1.

Clinical Commissioning Group (NHS)

No Objection

The CCG would not wish to have a dedicated health facility building on this development but would seek S106 monies for health provision to mitigate the impact of the development.

(Officer Note: The CCG has requested a preliminary contribution of £500,000 towards health facilities generally which has not been accepted by Officers as being CIL compliant. Officers are awaiting further advice from the CCG and will report these on the Update Sheet)

Cambridge Past, Present and Future

Original Comments

Object

Declare ownership of Hinxton Watermill and the Hinxton sluices on the River Cam. Objects on the following grounds:

-The proposal is not plan led and was not included during the recent local plan process. It should form part of the new LP process. Public benefits case to argue exceptional circumstances is not made.

-Massive unplanned change would result. Need for AAP with NUGC and AgriTech to allow for cumulative assessment.

-Absence of basic information relating to the infrastructure support and services. The provision of a primary school should not be left to reserved matters.

-The proposal has not followed requirements of the EIA scoping report. Alternative sites must be considered and evidence provided as to why this site is the only viable option. A reasonable alternative might be to locate worker housing in the proposed Uttlesford garden village or employment floorspace on nearby research parks, such as Great Chesterford, Granta and Babraham.

-Much of the proposed housing is intended for the general market rather than to provide accommodation for key workers on site. The housing provision is not needed by the Council to meet its five-year supply or to meet existing demand.

-The TA argues that the overall campus on both sides of the road will be sustainable due to the presence of the 1500 houses, but ignores the fact that the number of those employees not living on the site will more than double from its present figure.

A number of other specific concerns are made including: the proposed new site does not relate to the existing village, it is separate from Hinxtton and good placemaking would seek to integrate the two communities rather than keep them separate; the A1301 should be diverted to go around the outside of the new development; no provision for housing for key-workers; increased flows into the River Cam, recommend a new weir near Hinxtton Mill as a long term solution to the risk of flooding; loss of agricultural land; need for amount of floorspace proposed.

Recommended Conditions/Informatives
Occupational business controls related to campus genome work

Amendment Comments

Objection maintained

Whilst the reduction in overall building heights and additional information on landscape and biodiversity are welcomed, it does not overcome CPPF's original reasons for opposing the proposals.

Environment Agency

Original Comments

No Objection

Infiltration drainage, including soakaways, will only be acceptable where it has been demonstrated by the applicant that the land is uncontaminated.

Wastewater

There is insufficient capacity within the existing sewerage infrastructure to accommodate the full quantum of additional foul flows from this site. Great Chesterford WRC has limited permitted capacity to accommodate additional foul flows. Recommend phasing condition to ensure that sufficient foul capacity is always available to accommodate each phase of the development.

Water Resources

The development lies within the area traditionally supplied by Cambridge Water Company. Cambridge Water Company can supply the development using their existing network but only until 2045. Thereafter it is stated that Anglian Water would supply the site. Further evidence should be provided (secured by condition) that water supply to the site can be secured post 2045.

Measures to reduce water usage in the proposed new homes and the aspiration to achieve a target of 90 litres per person per day are supported.

There is a borehole abstraction within the proposed development site which is licensed to the Wellcome Trust. The licence holder must apply to the Agency if any changes to this licence are required.

Waste

The applicant's consideration for waste storage and collection systems is supported. Recommend a management and reporting system to minimise and track the fate of construction waste.

Groundwater and Contaminated land

Relevant supporting ES documents reviewed. The site overlies a principal aquifer, part of the Cam and Ely Ouse Chalk groundwater body, a Water Framework Directive Drinking Water Protected Area. Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They support water supply and river base flow on a strategic scale. The majority of the site is located within a groundwater SPZ, namely SPZ2 (Outer Zone) and the western and south-western part of the site lie within SPZ3 (Total Catchment). This means that the site lies within the catchment of groundwater abstraction boreholes used for public water supply.

The overlying soils at the site are classified as having a high leaching potential, meaning they can readily transmit a wide variety of pollutants to the groundwater. The presence of a hazardous chemical stores; a fuel tank; electrical substations; stockpiled material; and the potential infilled land from the historic railway cuttings are potentially contaminative. The site is considered to be of high sensitivity and could present potential pollutant/contaminant linkages to controlled waters. The EA is satisfied that the risks to controlled waters posed by contamination at this site can be addressed through appropriate conditions including those relating to: contamination and remediation; surface water and infiltration; piling; foul water; construction surface water run-off; and materials management. Various informatives are proposed.

Ecology

The proposals for biodiversity protection and enhancement measures for the site are satisfactory in that they would comply with the NPPF.

Recommended Conditions/Informatives
Wastewater phasing plan re Gt Chesterford WWT
Water resource statement post 2045
Waste management from construction
Remediation strategy and preliminary risk

assessment contaminated land
Unidentified contamination
Surface water SUDs and infiltration scheme
Piling risk assessment re ground water
Foul water scheme
Construction related surface water run-off
Materials management plan
Wastewater informative
Waste management informative
Energy centre informative
Piling informative
SUDs informative
Contaminated land informative
Groundwater abstraction informative

Amendment Comments

No further comments

Advice on Hinxtton Parish Council and Cambridge Past, Present and Future, Weir Proposal

Great Chesterford Water Recycling Centre (WRC) has a permit limit on the volume that can be discharged and is regulated by the EA. The EA expect Anglian Water to plan upgrades to the WRC (and all sewerage infrastructure).

If AW subsequently look to increase the discharge rate, this would be dealt with via a permit application, so doesn't need to be fully addressed at this stage. It would be necessary for AW to comment upon the legitimacy of the assumptions made in the analysis against any presumed increased discharge. It could be that AW will store, or throttle any excess volume (over and above permitted discharge rate) at their site. The EA would encourage further discussion between the developer and AW. With EA/planning safeguards, it would be premature to consider static weirs or other methods of mitigation.

The EA do not consider that there is, at this time, any CIL argument for the proposed weir in terms of water discharge, surface or treated.

Essex County Council

Original Comments

Does not challenge the applicant's assumptions about the expansion of the campus but raises concerns about how the application fits with existing and emerging plans (overall spatial relationship). A range of comments on the following topics are provided, which includes a number of objections in relation to certain topics.

Topic	Comment
Planning	Proposal is not plan led and should be plan led.
Cumulative	Proposal should cumulatively take into account NUGC.
Housing	Proposal would not contribute to housing need for the district.
	Housing would need to be tied to genome campus workers only.
	Housing should include affordable housing as a component unless otherwise justified.
	Housing mix should be controlled for RM's.
Flood Risk	No objection.
Adult Social Care	Highlights Supported Living opportunities.
Early Years and Childcare	Proposal generates a need for 104 spaces based on Essex demand.
Education	No comment. This is for Cambridgeshire County Council
Waste	No objection. any impact on Saffron Walden household waste facility would be minimal.
Highways and Transportation	Will liaise with CCC. TA does not take account of cumulative impacts from NUGC and this growth should assessed. The Sustainable Transport Strategy should be flexible enough to accommodate opportunities from NUGC, should improve cycling links and bus services to the south. Would welcome discussions regarding links from the site across the A11.
Economic	Supports the proposal, would strengthen the LSCC
Public Health and Wellbeing	Cumulative health and wellbeing issues in Uttlesford have not been considered.
Ecology	Highlights legislative and licencing requirement including NERC act 2006. The ES chapter follows best practice and should be appropriately mitigated.
Historic Environment and Buildings	Objection. Harm would arise to the significance and setting of heritage assets. This would be less than substantial harm. Para 196 of the NPPF engaged. Potential for archaeological remains.
Landscape	No objection. Good provision of green infrastructure.
Arboriculture	No objection.

Recommended Conditions/Informatives

Construction environmental management plan

Landscape and ecological management plan
Ecological surveys

Comments on Amendments (Sept submission)

Overall, ECC continues to have concerns regarding the spatial relationship between this significant proposed development on the South Cambridgeshire / Uttlesford borders, and the proposals within the respective local authority's local plans. This application does not appear to effectively recognise, or take account of, development proposals emerging within these local plans, and how this proposal would 'fit' strategically within this context. Importantly, it does not consider the potential cumulative, and/or cross-border, impacts of such development on a range of services, facilities and infrastructure (most notably highways), as well as the wider natural and historic environment in this location.

ECC has clearly set out its concerns in relation to the potential impact on the Essex highways and transportation network and would expect the applicant to provide further information for the Council's consideration. ECC would expect to be consulted on this further information before the application is determined; future consultations should be sent to growth&development@essex.gov.uk to ensure that a response is provided in a timely manner.

Greater Cambridge Partnership

No Objection

The TA does not propose any mitigation measures directly relevant to, or contributions towards, the GCP Cambridge South East Transport Study (CSETS) programme. The TA should acknowledge this strong relationship and the impact the development has on the CSETS study area.

The development is forecast to have a strong relationship with the A1307 CSETS study area with more than one quarter of off-site trips related to the residential element having destinations accessed via the A1307/A11(north), and more than one third of off-site trips related to the non-residential element being drawn from that area. Given this, the development would likely be a direct beneficiary of investment in that corridor. In terms of traffic impacts, depending on the scenario considered, the TA suggests that impacts would be felt at A1307/A11 Four Went Ways, the Pampisford Road/Bourn Bridge Road junction, and the A505/Pampisford Road junction. All are directly relevant to the A1307 CSETS. No mitigation is proposed at any of these locations within the TA. It is considered reasonable that a proportionate financial contribution is sought from the development to assist with the scheme's delivery and to mitigate the development's impact.

Grosvenor

Object

Makes a representation as the appointed master developer of NUGC. Supports the principle of employment growth at the WGC. Raises a number of concerns in relation to the following topics:

Topic	Comment
Departure from SCDC adopted LP	Significant departure from the LP (employment and housing elements). Proposal is not genuinely plan led. Does not consider wider infrastructure requirements. Should not be determined prior to the completion of EIP into UDC LP and outcome of the AgriTech appeal.
Housing	Housing not needed to meet objectively assessed needs. SCDC has an up-to-date housing supply. NUGC could supply housing to meet the need.
Education	The proposal should provide a primary school on-site.
Relationship to AgriTech	Parallels with reasons for refusal.
Impact on Uttlesford LP Preparation and EIP	Will compromise future planned growth within South Cambs, Uttlesford and at NUGC.
Deficiencies with the TA	The TA must consider residual cumulative impact on the highway network after accounting for plan-led growth. A collaborative approach to mitigating growth through transport mitigation must be taken. A number of technical deficiencies in the TA are raised by Peter Brett Associates on behalf of Grosvenor.
Deficiencies with the EIA	NUGC should not be discounted from cumulative assessment. There has been a change in circumstances following SCDC's scoping opinions (EIP now underway into UDC LP and at an advanced stage of preparation and updated Sustainability Appraisal).

Comments on Amendments (Sept amends)

Notwithstanding our support for the principle of employment growth at the Wellcome Genome Campus, our concerns outlined within our previous letter still stand. Those full comments will not be repeated here, but they include the following:

- The scale of departure from the recently adopted South Cambridgeshire Local Plan;
- The relationship of the Wellcome application to the SmithsonHill application (ref: S/4099/17/OL) and its subsequent appeal (ref: APP/W0530/W/18/3210008);
- The potential impact to a plan-led system and the Uttlesford Local Plan preparation and Examination in Public (EiP); and
- Deficiencies within the assessment of transport impacts and the Environmental Impact Assessment (EIA) accompanying the application.

The re-consultation of the application relates to the Housing Statement Update (August 2019), Viability Statement (August 2019), Response to Parish Councils (18 July 2019), Response to Consultation (July 2019), Draft Heads of Terms (August 2019) and the consolidated Design and Access Statement. These documents do not address our previous objection points and Grosvenor therefore maintains its objection to the application.

Our initial response sets out in more detail our reasons for objecting to the application, although the principle point of objection relates to the lack of an assessment of the cumulative impacts of the Wellcome application. In particular, the residual cumulative impact on the highway network after accounting for plan-led growth, given the exclusion of the North Uttlesford Garden Community (NUGC) as a cumulative scheme from the Environmental Impact Assessment and Transport Assessment.

Since the Wellcome application was consulted in January 2019, the following circumstances have changed, which should be acknowledged as material considerations by SCDC:

- Uttlesford District Council secured Government Garden Communities Funding to support the delivery of the three proposed Garden Communities (including NUGC).
- The Uttlesford Local Plan Examination was held in July 2019.

Should the Local Plan Inspectors confirm in mid-October within their expected Interim Letter that the Uttlesford Local Plan should continue through the examination process, then the Wellcome application will need to consider the cumulative impacts of NUGC. In its current form the Wellcome application is likely to compromise future planned growth within South Cambridgeshire, Uttlesford and at NUGC.

Conclusion

Grosvenor supports the principle of growth at the Wellcome Genome Campus, however we object to the development proposals in their current form for the reasons set out above. As such, Grosvenor considers that the application should be refused based on the information available, or the following should be taken into consideration prior to the determination of the application:

- The application should not be determined prior to the SmithsonHill recovered appeal and the conclusion of the Uttlesford Local Plan EiP, otherwise appropriate full assessments of both NUGC and SmithsonHill schemes should be undertaken and appropriate mitigation measures should be identified to accommodate strategic growth;
- Further work is undertaken to address the deficiencies of the TA; and
- SCDC should make a Regulation 25 request for further information in relation to the EIA to ensure that it can reach a reasoned conclusion on the significant effects of the development proposals on the environment.

Grosvenor reserves a position to submit further representations once the substantive position of Highways England and Cambridgeshire County Highway Authority are known.

As previously set out, Grosvenor is keen to meet with Officers to discuss these concerns and to find a solution whereby all growth can come forward in a planned and coordinated manner.

Highways England

Holding Objection

Currently reviewing the TA. The work is necessary to ensure the TA is adequate to understand the impact of the development on the strategic road network. A technical note is provided by AECOM on behalf of Highways England setting out a number of issues that need to be addressed.

A number of regular holding objections have been issued by Highways England. Any further response will be reported on the Update Sheet.

Historic England

No Objection

Having considered the comprehensive documentation submitted with the application, DAS, EIA (Cultural Heritage) and LVIA visualisations, Historic England are satisfied that the proposals would not cause harm to the setting of Hinxton Hall or 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. No objection on heritage grounds.

Ickleton Society

Objection

The Ickleton Society objects to the application for the following reasons:

Topic	Comment
Local Plan	Land to the east of the A1301 is not designated in the South Cambridgeshire Local Plan. Not supported by LP employment policies. The Society disagree that the economic arguments made by the applicants outweigh the harm arising from the proposal. Wellcome should have engaged with the LP process in 2015 when it revealed its initial plans and should wait for the review of the current LP. Proposal is contrary to LP policy S/6. The same considerations for refusal should apply to this application as to that of SmithsonHill for AgriTech.
Scale of Expansion	Urbanisation of the open countryside. Scale has increased since original plans (4,000 to 6,800 employees, 800 to 1,500

	houses).
Community Involvement	The statement with the application is misleading and underplays the level of local concern. Concerns have not been addressed by Wellcome in the application.
Traffic Impacts and Transport	<p>A significant number of concerns with transport impacts are raised by the Society. They include the following:</p> <ul style="list-style-type: none"> -The TA significantly underestimates impacts. Evidence from Google maps provided. -Changes to the A1301 will slow journey times along it and interrupt flow. -Construction and occupation of the expanded campus with the A1301 alterations will result in more rat-running through Ickleton (a largely linear village). The TA ignores this impact. -Increases in rat-running in Ickleton will further harm: heritage of buildings in the village; amenity (noise, vibration, pollution, driver confrontation); degrade/destroy the highway and verges; and compromise highway safety. -Proposed mitigation for rat running (unforeseen mitigation fund) is insufficient to address problems. -Proposal would result in under-use of the proposed Whittlesford Transport Hub. -TA takes no account of Chesterford Research Park, Babraham Research Campus, NUGC or AgriTech. -Northbound assessment of flow of traffic to McDonalds roundabout is flawed in the TA. Queuing is a problem. -Travel Plan targets are unrealistic. 55% of the campus are currently driving to work. 42.5% target is optimistic. -Issues with new business compliance with Travel Plan. -External traffic impacts from partners living in the housing are underestimated. -Signalisation of McDonalds roundabout will not work. -Radical transport solutions required along the A505. -Proposal will result in increased traffic queues and result in delays to the proposed bus/coach services run by Wellcome. -Expansion should maintain a single site and not be split by the A1301. The A1301 should be re-routed around the campus as per initial proposals. -Jct 9 of the M11 should be improved to allow northbound entrance to the M11 and southbound exit to the A11.
Housing	New population out of scale with existing villages. No local support for the level of housing proposed. 3 storey housing would be out of keeping with the area. LVIA misleading. Lack of affordable housing contrary to policy. Concerns raised regarding occupation ties to housing (initially and later) and that the housing will be ultimately sold or let to non-campus workers resulting in greater off-site impacts. Need for level of housing not justified through staff survey; need will be different from future businesses. Young people will prefer to live in Cambridge.

Change of Use of Land, Landscape, Environmental Damage	<ul style="list-style-type: none"> -Loss of agricultural land not justified. -Height and density out of character. -No plans for anything underground and scheme. -Buildings will be highly visible in the landscape on rising land. -A1301 will be urbanised. -Visual and landscape impacts will be very harmful. -Similar reasons for refusal as with AgriTech should apply. -Concept of splitting the site and being more visually prominent is against the grain of other science parks and is flawed. -A1301 should have an underpass. -Biodiversity impacts will be harmful.
Commercial businesses and start-ups	<ul style="list-style-type: none"> -Change in nature of the campus from research to commercialisation. -Proposed occupational ties not strong enough (10 years) -Existing vacancies in other research parks nearby -Co-locational arguments not demonstrated for commercial/translation work. -Collaboration does not required co-location (nearby will suffice). Appendix 3 of the Case for Growth demonstrates this.
Commercial Venture	<ul style="list-style-type: none"> -Similar to aspects of Hanley Grange, a Wellcome commercial venture. -Hotel would not be restricted to visitors to the campus only. - -There is sufficient space at Whittlesford Parkway and planned at the Imperial War Museum. -To a large extent, the proposal is a commercial venture for Wellcome to generate income rather than to expand its scientific research.

Amendment Comments

Objection Maintained

The amendments that have recently been made to the proposals, do virtually nothing to reduce the massively adverse impact that the development would have on the landscape, environment, traffic and the local community.

The reduction in the maximum height of buildings still means that they exceed the height of the existing Campus buildings and all buildings in Hinxtton with the exception of the Church. There appears to be no reduction in the density of the development, the number of employees or the number of houses. Together with the closeness of buildings to the A1301, the visual impact would still be huge.

The changes to the proposed roundabouts and the A1301 through an expanded Campus will not alleviate the problem of traffic choosing to rat run through the nearby villages instead of keeping to the A1301 which will have a reduced speed limit, additional roundabouts, junctions and crossing points.

The latest data from the village's Vehicle Activated Sign shows the average number of traffic movements on Abbey Street as around 3700 a day, equivalent to over 4000 on weekdays. Concerned to find that it is proposed to turn part of the small area of remaining agricultural land opposite Hinxton to sports fields. This is a further loss of good quality agricultural land.

Imperial War Museum

Original Comments

The Wellcome site is within the SCDC safeguarding zone around IWM Duxford. The proposed site is under a flight path. Although IWM planes are flying at a high altitude, IWM has concerns about noise abatement once the development is complete. This is something that needs to be explored before any residential development moves forward. Future house owners need to be made aware of aircraft flying above before purchasing. This will be particularly important around our air show days and weekends where we have the largest impact on our surroundings.

IWM Duxford must be notified of any intention to use cranes and restrictions should be negotiated to ensure minimum negative impact on both parties, e.g. ensuring the crane is lit, only erected for a certain amount of time. The possible increase of pressure on the A505 is a concern. We welcome the efforts to mitigate this, particularly around junction 10 and hope that further work will be done in this area.

Amendment Comments (April amends)

Original concerns not addressed

Amendment Comments (Sept amends)

No further comment has been received from the IWM. However, Wellcome has met with the IWM to clarify the issues that have been raised and provided further analysis of the noise implications for future residents of their site in relation to aircraft noise. This is summarised in the officer assessment.

Natural England

Original Comments

No objection

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected sites or landscapes.

Recommended Conditions/Informatives
Soil handling informative

Amendment Comments

No objection

The advice provided in our previous response applies equally to this amendment

North Hertfordshire District Council

We have previously raised concerns with Uttlesford District Council regarding the potential impacts of its proposed new North Uttlesford Garden Community (NUGC) on the strategic highway network. These concerns relate particularly to the A505 which connects Royston (and the District more broadly) to the M11 / A11. This present application is in close proximity to the NUGC proposal. The scheme does not form part of South Cambridgeshire's recently adopted Local Plan. NHDC has similar concerns relating to this proposal, either in isolation or in combination with the NUGC.

The Transport section of the Environmental Statement (ES) identifies only low impacts on the A505 west of the M11 following application of criteria-based thresholds. Notwithstanding this point, the ES does anticipate a 16% increase in peak flows on this link between the 2018 baseline and the 2031 with scheme scenario.

It is noted that the ES does not include consideration of NUGC as a cumulative scheme. The reasons for this, as set out in the appendices, have been reviewed and are understood. It is accepted that this application needs to be considered in the 'here and now' and that there is presently uncertainty over the (timescales for the) progress of Uttlesford's new Local Plan. Equally, should greater certainty over the Uttlesford LP be forthcoming prior to the determination of this application, it may be necessary for the applicant to review some of the supporting documents.

The evidence underpinning Uttlesford's emerging Plan suggests up to 70 additional peak hour trips would arise on the A505 west of the M11 should NUGC be implemented. Added to the figures above, there could be a 20% increase in peak flows on this link compared to the baseline.

In this context, the proposed 'adaptive mitigation fund' included in the draft Heads of Terms (or any alternate / relevant contribution) should be suitably framed. This should allow for proportionate contributions to any future upgrades of this section of the A505 if this proves necessary over the lifetime of the development.

Police Architectural Officer

No Objection

Original Comments

The documents in relation to community safety, crime, disorder and the fear of crime have been reviewed and a search of the Constabulary crime and incident systems for this location covering the last 2 years has been completed. This is at present a location with a low record of reported crime and incidents.

Asks for a meeting to discuss Secured by Design and measures to help reduce its vulnerability to crime including building security, external environment and layout.

Amendment Comments

No further comments

Terence O'Rourke

Comments are provided on behalf of SmithsonHill in relation to the AgriTech Park. A range of concerns are raised in relation to the applicant's transport assessment (VECTOS) by TPA - SmithsonHill's transport consultants - in relation to trip generation and mitigation plans for McDonald's roundabout including the relationship with Whittlesford Service Station.

Sport England

No Objection

There is scope to provide new sports facilities to meet future needs.

The residential occupiers of the new development will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base.

The population of the proposed development is estimated to be 3,021, which equates to an average of just over 2 persons per unit. The adopted Policy for outdoor sport provision requires 1.6 hectares per 1000 population, which equates to 4.83 hectares. There is likely to be a higher number of young, single people on the site.

The application is outline in form therefore the exact provision for outdoor and indoor sport is not confirmed at this stage. Sport England provide a suggested range of possible requirements for sporting provision, including for football (with pitches for community use), investment in existing local cricket club changing facilities and pavilions and mini and junior rugby off-site contributions.

Sport England advise that this information should inform the development of detailed plans on the site for outdoor sport provision and that there may also be scope for other outdoor facilities such as tennis courts and multi-use games areas (MUGAs). The demand for indoor sports hall space can probably be met by the proposed community centre, provided it is designed to allow provision of a single badminton court (18m x 10m).

Sustrans

No Objection

Provides comments on various locations for cycle infrastructure improvements to the national cycle network as follows:

-London Road from just north of the A505 roundabout through Sawston and up to the Babraham Road – this scored very poorly for safety in our Review – so we would support the creation of an off road / shared-use path.

-The A505 / A1301 roundabout – our surveyor noted an unaccompanied 12 year old (our benchmark for the NCN) is unlikely to use this current arrangement, especially at peak time – so any improvements here would be welcomed.

-Safe access for cyclists from Whittlesford Station to the development site – this will likely need to be an upgrade of the existing facility running adjacent to the A505 from Duxford Chapel to the A1301 roundabout.

-The on-road section from Stapleford linking in to the Genome Path could also be improved (it scored very poor for safety in our Review).

-The NCN Review scored the entire section from Hinxton to Duxford to Whittlesford as very poor, as the majority is on road – we'd welcome any improvements to this corridor too.

Uttlesford District Council

Original Comments

Uttlesford District Council continues to express concerns about the lack of consideration of the cumulative impacts of development in the surrounding area. UDC reserves its position around whether it is necessary to include North Uttlesford within the assessment of cumulative effects within the Environmental Impact Assessment (EIA). However, UDC does consider that it is appropriate to include North Uttlesford within this assessment.

The draft UDC Local Plan has been submitted to the Secretary of State. As such, greater weight may be attached to the proposals within it. While there are significant unresolved objections to North Uttlesford, UDC notes the comments received to the UDC Local Plan from SCDC in 2017 and 2018, in which SCDC said that the UDC Local Plan should take account of draft allocations in their emerging Local Plan. At this point in time, the proposals in SCDC's Local Plan had also received significant objections and the SCDC Local Plan was at the examination stage. The submission of the UDC Local Plan and the recently received updated Sustainability Appraisal represents a material further change in circumstances under the EIA regs.

UDC considers that the modelling supporting the application should use the allocations in the adopted SCDC Local Plan and the adopted Cambridge Local Plan. Otherwise there is a risk that this proposal could put at risk the recently adopted SCDC Local Plan (or proposals in Cambridge's Local Plan).

A scheme of this scale and significance would normally be brought forward through the Local Plan process, so that aggregate road, education, and utilities infrastructure could be considered in the round and the proposals could be considered against the reasonable alternatives. The UK planning system is a 'plan-led' system, and significant applications that will have wider impacts "jumping the gun" by seeking approval outside from this process undermines the 'plan-led' nature of the system. SCDC is commencing work on the Greater Cambridge Local Plan in 2019, and this would be the proper way of processing a proposal of this scale.

Without prejudice to UDC's concerns around the way the proposal is being considered; were the proposal to be approved the scheme should ensure it is capable of being appropriately linked to North Uttlesford Garden Community, through the provision of walking and cycle links across the A11. The proposal should also reflect the potential for public transport links across the A11, through consideration of the Combined Authority's proposals in the area, as well as synergies between the sites relating to jobs and education.

Notwithstanding the planning application at Wellcome, UDC considers that the two Councils, together with other appropriate partners, should be working to look at development proposals in the area in a wider context. The accident of a County border should not mean that our residents suffer unnecessarily through substantial schemes in close proximity being considered at an individual level.

Comments on Amendments (Sept amends)

The Council **objects** to the proposed development on the basis that it conflicts with the Government's requirement for a plan-led planning system, and that its cumulative impacts together with those of the planned North Uttlesford Garden Community (NUGC) have not been properly assessed.

Paragraph 15 of the National Planning Policy Framework confirms that the planning system "should be genuinely plan-led", not least because such an approach provides the "platform for local people to shape their surroundings". A scheme of the scale and significance as that proposed should therefore be expected to come forward through the Local Plan process. Instead, a speculative application has been submitted that acknowledges an advanced plan for a Garden Community on adjacent land but makes the clear choice to ignore both the likely cumulative impacts and the numerous opportunities to plan holistically for the benefit of existing and future communities.

Our previous consultation response highlighted concerns about the lack of consideration of the cumulative impacts, and it appears that the applicant has submitted no further information since then to address these. However, while the application is largely unchanged, the emerging Uttlesford Local Plan (eULP) has advanced even further. 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. The plan's strategic policies, including on NUGC, should therefore be given proper consideration and increased weight in the planning decision.

Not only is the application inconsistent with the plan-led approach, it also surrenders another key opportunity to assess cumulative impacts and potential mitigation. Environmental Impact Assessments (EIAs) should take into account the cumulative impacts of a proposed development together with other reasonably foreseeable developments. However, the applicant and South Cambridgeshire District Council (SCDC) in its scoping opinion of 19 November 2018 have acknowledged and chosen to ignore NUGC despite the numerous significant interactions between the developments that have been highlighted by UDC and other consultees, including Cambridgeshire and Essex County Councils in relation to the deficient Transport Assessment. On this point, the TEMPRO uplift is considered an inadequate proxy for wider Local Plan growth and, as minimum, NUGC should be included as a sensitivity test. The below list is not exhaustive but provides an indication of the range of cumulative impacts associated with both developments:

- Traffic movement on the existing highway network, including nearby junctions on the A11 and A505
- Public transport provision
- Walking and cycling
- Education provision
- Local housing need
- Local employment

The scoping opinion confirms that NUGC is 'scoped out' of the EIA on the basis that the eULP is unsound. It therefore follows that, should the Inspectors confirm in mid-October that the plan is sound, SCDC's position would correspondingly be reversed and cumulative impacts would need to be taken into account. The scoping opinion reserved the right to request additional information should there be a change in circumstances. We would argue that the advancement of the eULP justifies such a request but, should SCDC disagree, at the very least it would be advisable to await the Inspectors' conclusions before making a decision in order to ensure that the EIA is robust.

Should SCDC decide to grant planning permission, provision should be made through any legal agreements, planning conditions and subsequent reserved matters applications for effective sustainable transport links between the application site and NUGC. This would include ensuring that opportunities for walking and cycling links across the A11 are maximised, and that the emerging public transport proposals in the Greater Cambridge area can be accommodated within both the development and NUGC.

As highlighted in our previous consultation response, I feel that the two Councils should work together to holistically plan our strategic projects taking into account their wider context. It is vital that the decisions we take benefit the existing and future communities that will function across both areas, unconstrained by our administrative boundary.

Wildlife Trust

Holding Objection

Welcome commitment to 10% net biodiversity gain and proposal to produce a Landscape and Ecological Management Plan. No specific comments regarding protected species.

The Wildlife Trust ask for clarity regarding suitable alternative natural greenspace proposed on-site as an alternative to nearby designated sites, with particular reference to the bund. The proposed habitat creation and enhancement is appropriate to the site. A number of detailed points are raised:

- the bund on the eastern side of the site and its ability to support calcareous grassland species. Its composition and form will be critical to this.

- management strategy for the borders of retained arable farmland.

- clarity over proportion of green/brown roofs proposed.

- more detail in relation to the green corridors.

- highlights a number of errors in the Biodiversity Impact Assessment.

(Officer Note: The Wildlife Trust has been consulted on updates to the biodiversity calculations but has not responded)