

Appendix G, Parish Council Representations

Babraham Parish Council

Objects: Babraham Parish Council broadly welcomes the proposed development because: it will add to local employment in the area; it proposes measures to mitigate major traffic impacts; it is designed with care to provide a rich sustainable environment; it will contribute economically to the locality. Babraham Parish Council notes, however, several concerns that cause it to Object to the proposal in its current form.

Transport: Wellcome's transport assessments suggest single-occupancy vehicle (SOV) use will increase 2.7-fold at completion. Wellcome data state the Campus currently has 2500 employees, with 43% SOV use, implying 1075 journeys: the development adds an additional 4300 employees, a total of 7800, with 40% (intended) SOV use, implying 3120 journeys. If 1500 live on Campus, 6300 will travel to work, implying 2520 SOV journeys.

Given the general price pressure for South Cambridgeshire employees' domiciles to more distant (north and east) locations, Babraham Parish Council questions whether the intended level of bus usage can be achieved. Currently, 32% of employees travel by Campus bus, implying 800 people. If same percentage were to apply after development, this would imply almost 2500 people, or around 35 buses at each peak.

Duxford Parish Council

Original Comments

Objects: On the following grounds:

Traffic and Rat-Running

Of greatest concern is the effect of the development on traffic and travel. The traffic analysis ignores ran-running of through traffic from the south and west of Cambridge (joining the A505 from M11 J10) cutting through Duxford, Ickleton to Gt. Chesterford on to the B1383 or through Hinxton to the A1301. Traffic from the west (Royston area) avoids the A505/M11 by using minor roads through to Chrishall Grange then Grange Road to Duxford and onwards. The traffic analysis should also consider the Hunts Road roundabout, which is at capacity (acknowledged by Agri-Tech) and a point of rat-running because the A505 narrows to single-lane. Modern navigational software has increased rat-running. It increases disproportionately when the A505/A1301 is at capacity which is a regular occurrence. The traffic analysis makes no allowance for off-site traffic impacts from the proposed housing (partners, school trips etc.).

M11 Junction 9

If the development is in the national economic interest, it is also in the national interest to improve junction 9 of the M11.

A505/A1301 'McDonalds Roundabout'

Northbound entry to the roundabout is not properly modelled to take into account exit traffic from the services onto the A1301. Changes to the roundabout will prevent eastbound traffic turning into the services across the A505. The revised arrangement around the roundabout will create a manoeuvre causing conflict.

M11 Junction 10

The proposed signalling of the southbound off-slip will have no effect on congestion.

Scale

The overall size (scale and height) and no. of houses is enormous. The proposal does not accord with the SCLP 2018 and 1500 houses is more than in Duxford, Ickleton and Hinxton combined. The Campus Linked Worker obligations are unworkable.

Amendment Comments

Objects: The Duxford Parish Council are under no doubt about the quality and importance of the work done at the Genome Campus. The Parish continue to object to the proposal. Generically this is on the ground of the scale and impact of the development and the following notes describe the more detailed reasoning behind this position.

This is rural Cambridgeshire and beyond the green belt around Cambridge that was put in place to prevent the unlimited sprawl of the city. One of the area's defining features is that of a series of villages set in, and separated by, a rural agricultural landscape. This is supported by the current local plan that defines a small number of large expansions, such as Northstowe, Waterbeach and Cambourne, instead of many smaller expansions.

The original choice of Hinxton Hall by Sir John Sulston for the Wellcome Human Genome Project was to find a convenient site to get up and running quickly. It was a research site that was available, having previously been a material science research site under the Tube Investments Group. The subsequent development of the site since then was not planned from the outset. The Wellcome Trust need to live with the legacy of that decision.

Local Parish Councils have had several years of pain under the problems that the South Cambridgeshire District Council local plan has suffered with its "housing land supply" issue. This has resulted in significant inappropriate developments driven by developer greed for maximum returns and has left a significant emotional and physical scar on the parishes.

Duxford Parish Council have yet to see justification for the full 1500 accommodation units proposed. Whilst the usefulness of a 'soft landing' for just arrived workers or short term visitors is understood (and indeed this is what the EMBL Heidelberg seems to offer <https://www.embl.de/aboutus/contact/accommodation/index.html> which was mentioned at the presentations), the PC don't see the need for long term accommodation. The long-term accommodation will generate as much traffic as you are trying to save by dint of the partners/children/etc. needing to get from their house to their work/school/collage etc.

Transport: The location of the site means that the "last mile" of transport will have to be along the local roads, whether that is by car, coach or cycle. Currently the local roads are over-crowded and several of the villages (notably Duxford and Ickleton) suffer significantly from rat running. The Highways Dept seem reluctant to try novel ideas to fix this, the reason they don't want to is that it will then put another 4000 journeys per day back on to the A505 and it will go from bad to complete gridlock that will not be fixed by adding traffic lights to the roundabouts.

Whilst the idea of opening the private campus bus service to the extra family housing that is proposed, as well as opening it up to local residents, seems a very generous offer, it will add a very variable load to the site bus services. The Wellcome Trust will rapidly find this a burden that they wish to divest as quickly as possible. The description of the EMBL Heidelberg Site Bus Services explicitly discourages the use of it for social trips into the city. How will Campus site staff feel if the site bus is full of teenagers going into Cambridge of an evening and they have to catch a later one?

The issues with medical practice in Sawston not wanting to run another site at the Campus, for example, is just an example of the situation of in which the UK Medical Practices find themselves in, where they are entirely driven by cost. To them the cost of running another site will be higher than if they expand the existing one to cope with the extra patents. They do not have to bear the transport costs (on many levels) of getting people to and from their surgery.

Comments on Amendments (Aug amends)

Maintains objection.

Foxton and Fowlmere Parish Council

No comment

Great Abington Parish Council

Objects: The core work of the Campus is held in high regard and a reasonable expansion would have been supported, however, this proposal is for a very big expansion which goes far beyond that core work. The chief concerns are as follows:

Great Abington residents are already severely constrained by traffic obstructions at peak periods on the A505, where it meets the A1301 and the M11. The scale of the proposed development would massively increase these problems. The mitigation measures proposed are wholly inadequate.

The applicant suggests that wider traffic problems would be addressed by traffic lights at a modified McDonalds (A505/A1301) roundabout and at a modified Junction 10 roundabout with the M11. A more fundamental approach is essential.

It is already acknowledged that traffic lights at the McDonalds roundabout would result in longer queues. The knock-on effect would be longer queues on the A505 back to the M11 and to the A11 at peak times. These queues are likely to result in tailbacks onto the M11 at the J9 exit slip road and onto the A11 at the Four Went Ways. It is essential to provide north facing slips at J9 of the M11. This would relieve congestion from the A505.

The Campus has tried hard to reduce travel to work by car, however, overall, 55% of current Campus staff drive to work. This has been the percentage for some time and is higher than target. Their traffic predictions use 42.5% allowing for 1500 workers living on site and an enhanced travel plan. This seems very optimistic and is still an increase of 1515 journeys in each direction without counting deliveries, visitors, traffic generated by conferences, hotel, social facilities etc.

The estimate of outward journeys by partners of workers living on Campus is extremely low, based on the National Traffic Survey and looking at other developments which are suburban and edge of town areas. Many of these residents will be young, so the proportion commuting at peak times will be higher than the national average. This Campus is in the countryside, so a higher proportion of journeys are likely to be made by car.

Welcome Genome should provide some sort of light railway or guided bus link across its own land, to provide direct access to the site from Whittlesford Parkway. There does not appear to be much attention given to encouraging people to take outdoor exercise. The provision of public footpaths and bridleways should be included. Permissive footpaths are not accepted as these can be withdrawn at any time as has been the case nearby at Granta Park.

Other Issues

A substantial number of buildings in this proposal are flexible space to be leased for research and development and other commercial purposes. These, in some cases tall, buildings would be built on fields across the A1301 road from present Campus and would result in the loss of a significant amount of high quality agricultural land. This is more of a money-making aspect rather than an expansion that is vitally linked to the success of the Genome core work. This proposal has to be seen in the context of the other looming local issues of North Uttlesford Garden.

Great and Little Chishill Parish Council

Original Comments

Neutral: In general the Parish Council is cautiously favourable towards the proposal and certainly welcome the influx of investment in the area and associated job creation. However, the Parish is concerned about the increased imposition on the

local infrastructure, in particular roads and schools that would result from the increased population of residents and workers in the development. Corresponding plans for e.g. improving roads and road junctions, or the addition to or of schools in the surrounding area have not been seen. This application and other major developments have major consequences on access in and out of Cambridge. This matter needs to be seriously addressed and not just left with "a waiting and see" strategy.

Amendment Comments

Whilst the Parish Council welcomes new R&D and commercial facilities, it has grave misgivings about the impact on the infrastructure of local roads and facilities.

Great Chesterford Parish Council (GCPC)

Objects

South Cambridgeshire Local Plan

The application is contrary the SCDC Local Plan. The SCLP 2018 does not allocate the land for either employment or for housing. It has not been assessed as such through that process. An application of this size, and the impacts as severe as these, should be put forward through the local plan process. UDC has not been afforded the opportunity to make representations regarding the Wellcome expansion through the SCDC local plan process.

Emerging Uttlesford District Local Plan (UDC-LP)

The application has failed to sufficiently take into account the emerging UDC-LP Local Plan (submitted 25/01/19). Concerns are raised as to the extent to which the Duty to Cooperate has been applied. UDC has not considered the impacts of the Wellcome development on its emerging LP and North Uttlesford Garden Community (NUGC) in particular. There has been a lack of proper cumulative impact assessment.

North Uttlesford Garden Community and Cumulative Assessment

The application has failed to adequately take into account the proposed settlement for 5,000 homes at NUGC. There is scant legally robust consideration of the impacts that NUGC, Wellcome and AgriTech would bring. The three proposals would result in significant harm to the area in terms of air quality, traffic flow and rat running through the local villages. The site should come forward only as part of the next call for sites in the SCDC plan making process.

Landscape and Visual Impacts

Landscape and visual impacts are not properly mitigated. The proposed development is insensitive to the countryside, to Hinxton village, and to the Existing Campus and its buildings. The density of development is greater than existing, and many of the buildings would be higher than the Southfield buildings. There is no design justification for the height, scale and massing of the proposed buildings and this would be out of character. There appears to be no consideration of undergrounding of any of the facilities including car-parks. The buildings would be highly visible across the open fields along the A1301. In winter the trees will provide minimal screening. Changes to the A1301 would be out of character. The chosen LVIA viewpoints are misleading. The proposal would be highly visible and highly detrimental in terms of landscape and visual impact. The proposal is contrary to NH/2.

Transport

The application fails to sufficiently mitigate the transport impact of the development. It will increase rat-running to the detriment of nearby villages, including Great Chesterford, Hinxton and Ickleton. In combination with NUGC, it would result in increased journey times. The transport assessment does not accurately reflect existing road conditions; congestion outside of peak hours also occurs. Regard should be had of IWM Duxford air-shows and biennial June Cereals Exhibitions. The issue of queuing by northbound traffic at the McDonalds roundabout is omitted in the analysis. The traffic issues at this roundabout are chronic. The mitigation measures will not have the desired effect. Strategic (unidentified) infrastructure improvements are required and there is no budget for these.

Community Engagement

GCPC is disappointed at the lack of community engagement, including in relation to NUGC. There has been little if nothing by the way of discussion with us as to what appropriate development of the Wellcome Campus might look like.

Case for Growth and Need for Housing

The commercial growth of the campus is not justified. The site of the proposed residential element has not been allocated for housing being outside the development envelope of Hinxton village. The proposal is contrary to policies H/1, S/7 and S/11. There is no affordable housing being proposed. A housing development of this scale (some 1500 units) is akin to a new settlement. The

enormity of the residential development on nearby small and well-established communities has not been adequately considered.

Other issues

The development would cause light pollution. The proposal would involve the significant loss of best and most versatile agricultural land and is contrary to policy NH/3:1. The biodiversity chapter (ES Vol I Ch9) does not objectively consider the impacts of the proposal. The habitat will be fragmented and the proposal is contrary to policy NH/4. The application does not provide long term protection for Hinxton the retained farmland does not have any protected status. The proposals are inadequate to deal with the healthcare and educational impacts of the residential element of the proposed development. The application does not provide for sustainable access to Great Chesterford. The proposal is very insular in nature. There is scant reference to facilities being available to the wider community. The lack of adequate education, open space, sports and other facilities is evident and disappointing.

Great Shelford Parish Council

Objects: Support the existing research at the campus and the job creation that would be brought about but believes the proposal would have a severe negative impact on the local transport infrastructure.

Proposal needs to be considered holistically with other large-scale proposals in the area. Not enough housing is proposed and this will result in additional trips onto the network. Rail infrastructure needs improving including: Cambridge South acceleration; better bus service; creation of P&R at W.P.; improved signalling; rail station; Stanstead airport trains need to call at Whittlesford. Transport projections appear too low. Transport solutions need to be more radical. Asks for improvements to junctions within Great Shelford.

Comments on Amendments (Aug amends)

The GSPC remains concerned about the implications of this development for traffic in the surrounding area, as well as for schooling and health provision. We reserve the right to make further comment after we have consulted with other Parishes.

Heydon Parish Council

Neutral: Any development will have an impact on the already busy A505.

Hinxton Parish Council

Original Comments

Objects: Hinxton Parish Council raises serious objections to the planning application by the Wellcome Trust to build on agricultural land adjacent to the village.

Hinxton has in general enjoyed cordial and constructive relations with the Wellcome Genome Campus since it was established. The village has considerable pride in the Campus' medical and other genome-related research work. There is widespread acceptance that the continuation of this work may require moderate and appropriate growth. However, substantial material objections to the proposed expansion concerning its scale, its nature, its speed and the inadequacy of proposed traffic mitigation and other infrastructure are raised. Hinxton PC argue that the proposal as it stands would severely damage the economic and everyday life of Hinxton village.

The material objections are given in six sections:

1. The application does not comply with the SCDC's Local Plan adopted in 2018
2. The traffic and transport analysis is flawed and the mitigation measures are inadequate
3. The impact on the landscape and environment would be substantial and damaging
4. The change of function of the Campus embodied in the application is inappropriate
5. The proposed housing numbers are inappropriate
6. The proposals fail to meet community needs or to engage with the local community

Compliance with the SCDC approved 2018 Local Plan

The proposed development is not included in the SCDC 2018 Local Plan. The present Wellcome Genome Campus, including land down to the county boundary west of the A1301, is designated as an Established Employment Area (EEA) (Policy E/15(2e)). The 'Expansion Land' is outside the EEA and would have a negative impact on surrounding countryside and landscape character. The proposal is contrary to policy E/15:3. The proposed development contravenes the 2018 Local Plan's specific designation of Hinxton as an 'Infill Village' (S/11).

The proposed development is contrary to the requirements that the 2018 Local Plan places on 'New Employment Development in Villages' (policy E/12), on 'New Employment Development on the Edges of Villages' (policy E/13), and on 'Expansion of Existing Businesses in the Countryside' (policy E/16).

Hinxton is a village of 150 residential houses and a church. The Wellcome Trust's application proposes:

- to almost triple the workforce on the Campus to 6,800
- to more than triple the area it covers by extending it eastwards across the A1301
- to build up to 150,000 sqm for flexible use in classes A1, A3, A4, B1, B2, B8, C1, and D1
- the majority of the non-residential buildings to be for leasing to third parties
- the buildings to be up to 20m in height

- to build up to 1,500 residential dwellings in buildings of up to 11m in height
- a 175 bedroom hotel and conference centre
- a number of multi-storey car parks

By no stretch of imagination could the proposed development be considered to be ‘in keeping with the category and scale of the village, and be in character and scale with the location’ or ‘of a scale appropriate in this location’ or without ‘acceptable adverse impact on the countryside with regard to scale, character and appearance of new buildings’ or without ‘significant adverse impact in terms of the amount or nature of traffic generated.’ The application is in flagrant breach of central policies set out in the SCLP 2018.

Traffic and transport

Extreme traffic congestion is Hinxtton PC’s most immediate current cause of concern. At weekday rush-hours the village already experiences ‘severance’ for prolonged periods as a result of traffic pressure along the A505 and A1301 and at their junction at the ‘McDonalds’ roundabout. This Parish Council has recently carried out traffic surveys. The results make clear that the roads around McDonald’s roundabout typically reach capacity during peak hours with substantial queues on the A1301 from the south. Queues are frequently observed that stretch along the A505 both to the east and west for substantial distances up to the McDonald’s roundabout.

These recent observations are supported by previous more professional traffic surveys undertaken for other nearby development sites. The village’s everyday experience, reflected in the surveys, is that this deterioration has continued. It is a severe problem for Hinxtton households.

McDonalds roundabout: the Vectos traffic model used in the application does not identify it (‘junction 19’) as meeting the ‘queue criteria’ sufficient to require ‘detailed review’ and ‘further analysis’. The Vectos traffic analysis and modelling are unconvincing. These are set out in full in the consultation response but are as follows: Assumptions about traffic generated by the development appear to be unrealistic; proposed traffic mitigation measures away from the Campus are inadequately modeled; the modelling appears to be blind to long-distance traffic passing through; the traffic modelling appears to ignore local by-roads; the validity of some traffic survey data is unclear; a large number of unsupported assertions are made on key issues.

Sampled independent audits of all data and analyses of traffic effects should be funded by the applicants.

Public transport

Early consultation suggested Wellcome might take advantage of their estate extending as far as Whittlesford Parkway rail station to install public transport in the form of an off-road guided bus or light railway. These options have now been dropped. The application’s mitigation proposals for public transport are worse than inadequate.

The proposal is contrary to policy T1/2.

Impact on the Landscape and Environment

Height

The proposal is approximately ten times the number of houses in Hinxton. Buildings would be limited in height to 11m in the housing area, rising to 16m and in a few places 20m in the commercial area. They would be sited on a rising slope of open agricultural land. The proposed Wellcome Trust buildings are significantly taller than those nearby. The larger ones would, at 20m, be substantially taller than those on the present Genome Campus. The Expansion Land buildings would be on open, rising ground, facing the village with little screening. The massive scale of the proposed buildings would greatly diminish the existing village. The proposed buildings are unacceptably tall and 'not in scale with the location'.

Land

The proposed development 'would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land' and such land has not been 'allocated for development in the Local Plan'.

Landscape

The evidence provided in the application gives a misleading impression of the landscape impact of the proposed buildings. The choice of viewpoints is inappropriate for a fair assessment. The radius of viewpoints needs to be greater than 3km. The selection of viewpoints understates the visual impact of the proposed development on the surrounding countryside.

Biodiversity

The suggestion that the scheme might 'maintain, enhance, restore or add to biodiversity' as a whole is disingenuous. Most of the site would be permanently subject to human activity and built upon. The total natural undisturbed biomass would be substantially reduced. There would be no net 'positive gain'. Many natural species currently present would not remain on the site.

Wellcome own most of the open land in and around Hinxton village. The Wellcome Trust is a corporate supporter of the local Wildlife Trust and works admirably with it to maintain the 6ha Wetlands Nature Reserve and has a unique opportunity to do similar work on the precious 3km stretch of the Cam river valley to the north of the Campus. The commitment to biodiversity is extremely weak. The proposal fails to make the case that it will enhance, protect or increase biodiversity in aggregate. It fails to compensate for this by environmental enhancement on the Trust's adjacent land. It is contrary to policies NH/4 and NH/6

Flood control and aquifer protection

Discharge from the Expansion Land, whether direct run-off or via the Great Chesterford sewage treatment site, is eventually into the River Cam. Much of the present Genome Campus site and much of the Wellcome-owned Cam water meadows are classified as Flood Risk Zone 2 or Zone 3. This Wellcome land extends past Hinxton and for 3km to the north. Hinxton PC suggest that Wellcome

should construct a simple compound weir where the mill race departs from the original river bed.

The application's proposals to manage flood risk are short-sighted and narrowly focused and ignore 'opportunities to reduce flood risk elsewhere'. The applicants should be required to consider more effective long-term water management across the whole of the Wellcome Trust Hinxton land. The proposal is contrary to policies NH/2, NH/3, E/12, E/13, E/15 E/16 and CC/9.

The change in the balance of activity on the Genome Campus

Hinxton Parish Council has no objections to the continued development of the existing Wellcome Genome Campus EEA as a centre of genome-related scientific research. The proposed Expansion Land development marks a major shift in the balance of activity on the Campus. The great bulk of proposed activity on the Expansion Land is intended to be by non-charitable corporations leasing buildings or space within buildings for translational as well as other commercial work. This includes manufacturing and distribution, allowed by the B2 and B8 classifications included in the planning application. The shift in strategy is challenged, as is the need for the physical proximity of sharing the same site. The reasons for the substantial growth in numbers appear not to be scientific but financial. The principal reason for the proposed shift in the balance of site function by the Wellcome Trust would appear to be so that it can maximise the income it receives from its genome-related work.

The financial benefits to the Wellcome Trust of the proposed commercial development on the Expansion Land should not outweigh the substantial and unmitigated increase in economic and everyday costs that would be imposed on the local communities.

The proposed housing

The aspects of the application relating to housing are contested. The application provides for no affordable housing. This is in breach of the Local Plan Policy H/10. There is little evidential basis for the large number of up to 1500 units of accommodation which have been applied for. The model of housing ownership and finance that is proposed does not appear to be sustainable. The Parish is in favour of Wellcome Trust's proposal not to sell the freehold of housing land and not to engage in building speculative housing. The condition that at least one occupant should work on the site is, however, most unusual with the implication of eviction on loss of job. The very large number of housing units proposed in the application has no adequate justification and appears to be largely for financial return. The proposal is contrary to policy H/10.

Meeting community needs and engaging with the local community

Hinxton village of 150 houses would be enveloped by what is, in effect, a company town of up to 1500 residential units. The social implications are colossal. No consideration is given to the consequences for the village. It is as if the proposed development is being dropped on a social desert, not on a lively community dating back beyond the Domesday Book. Virtually nothing concrete is offered to the present local community by way of compensating facilities, amenities and services. Very little concrete is offered for the new community in terms of sports facilities, schools, health centre, playground, community hall and so on. Even the commitment to provide access for 'local people' appears to be constrained.

It is as yet wholly unclear what services and facilities might be provided for the wider community with the development or how far, if at all, they will be accessible to the present village of Hinxton. Nothing is proposed that will 'minimise impacts on the existing community'. The proposal is contrary to policies SC/4, SC/5 and SC/6

Community Involvement

On the development of the present planning application the process of consultation has been extremely frustrating. The Trust has put on a series of presentations, over more than three years, and has encouraged informal discussions at which local concerns have been made clear. The comments of the Parish about traffic congestion and the need for alternative public transport appear to have been ignored. Extreme concerns about the large scale of the proposed expansion and the unnecessary commercialization of the site have been worse than ignored. Over the period of consultation the scale of the proposal – in terms of employee numbers, of housing, of building size, of commercial rather than scientific prioritization, and of landscape despoiling – has grown. There has been no serious effort by the Wellcome Trust to develop 'partnership' with the Parish community as 'stakeholders'.

Conclusion

The planning application is in widespread breach of SCDC's 2018 Local Plan. SCDC is urged to request the Wellcome Trust to withdraw and reconsider their application in the light of these comments.

S106 Comments (comments of 4th Feb subsequently updated in Sept 19, see below)

Environmental mitigation

The most irreversible consequence of the proposed development for Hinxton would be the degradation through building and other activity of the open countryside that surrounds it, much of which is owned by the Wellcome Trust.

The Parish Council seek the following mitigation:

-A compound weir (and associated footways) should be constructed where the mill race leaves the original river bed in order to mitigate flood damage risk (as already

proposed to Wellcome Trust). Possible cost - £100,000 (a further detailed note requesting this has been submitted by the Parish Council).

-Safe footpaths and safe cycle paths and associated bridges, in addition to those planned for the functioning of the site, should be provided, both for recreation and wider access, across Wellcome land towards Great Chesterford, Ickleton, Whittlesford Parkway, Duxford and Sawston. Possible cost - £250,000.

-The Wellcome Trust should be required to commit to improving and extending environmentally responsible management of all the farmed land it owns around and within Hinxton with a view of meeting World Wildlife Fund 'Living Landscape' standards within ten years. Possible cost - £100,000 per year for the first ten years.

-Community facility mitigation: £250,000, delivered in phased payments over five years, administered by the Parish Council, to meet the needs of a rapidly growing village population in terms of, for example, adjustments to the Village Hall and improved car parking.

-The addition of traffic calming measures to roads within Hinxton village and the building/rebuilding of pavements on the High Street, decided by agreement with the Parish Council. Possible cost - £250,000, phased over five years.

Amendment Comments (April Amends)

Objections Maintained: The amendments to the application and the additional information provided in the Addendum Report fail to modify the PC objections. In summary, the amendments relate to:

Effect of amended maximum building height on the landscape (A1, A2 and A4).

The proposal to reduce the maximum building height from 20m to 16m in certain areas and to 11m in others is largely immaterial to the overall impact of the proposed building complex on the landscape. Since the existing largest buildings on the Campus Site do not exceed 16m, it is reasonable to doubt whether the discarded 20m maximum was ever seriously intended. The proposed complex of new buildings which would be up to 16m in height would be several times greater in footprint than the existing large Genome Campus buildings. With the exception of Hinxton Church, the houses in the village are under 8m in height. The new buildings would be on rising land. Their impact on the landscape would still be massive. The use of wide-angle photography in the additional visualisations that have been provided downplays but does not contradict this. Irrespective of amendments A1, A2 and A4, the application is in breach of SCDC Local Plan Policies NH/2, E/12, E/13, E/15 and E/16. The proposed buildings remain unacceptably tall and not 'in scale with the location'.

Effect of amended roundabouts and highway on traffic (A3)

The proposed minor changes to the two roundabouts and highway of the A1301 where it passes through the expanded Genome Campus will have negligible implications for the surrounding communities. They will not significantly alter the substantial extent to which through traffic on the A1301 will be impeded by the two

Campus roundabouts, additional road access and pedestrian crossing points. The proposed amendments will not diminish the effect of the proposed project in diverting through-traffic to 'rat-runs' on the by-roads through the centres of Ickleton, Hinxton and Duxford. Neither this amendment nor additional information in the Environmental Statement Addendum contradicts the earlier evidenced conclusions that:

- The assumptions about traffic generation by the development are unrealistic.
- The proposed traffic mitigation measures away from the Campus on the A505 are inadequately modelled.
- The traffic modelling is blind to long-distance traffic passing through on the A1301
- The traffic modelling effectively ignores the impact on local by-roads through villages.
- The validity of the survey data used is unclear and suspect.

Irrespective of amendment A3, the application remains contrary to Local Plan Policy T1/2 and E/16.

The Wellcome Trust have not demonstrated that 'they will make adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal'. The evidence suggests the proposal would 'have a significant adverse impact in terms of the amount or nature of traffic generated.'

Effect of an additional access point for pedestrians and cyclists (A5).

The proposal to have new informal access from Tichbault Road would have little impact on the supposed amenity value of the site because it is already proposed that it would be highly permeable to local residents. What it would do is have the adverse traffic effect of directing more cyclists, going to and from the site from the north, to cross the busy A1301 in order to get to the cycle track on the west side at the junction with Tichbault road where no roundabout is proposed. This would increase safety hazards to cyclists and delays to traffic on the A1301.

The additional access point would have minimal added amenity value but would increase hazards facing cyclists.

Effect of re-designating land previously set aside for agriculture for use as playing fields(A6).

The proposed re-designation further weakens the application's claims that the development will increase biodiversity. Replacing arable fields with close-mown grass used for games will diminish undisturbed biomass and biodiversity. It also weakens the applicants' claim to have responded to local residents' expressed landscaping wishes. The PC note the revision of biodiversity arguments in the Environmental Statement Addendum Report Replacement Appendices 9.1, 9.2 and 9.3, but they do not alter the fundamental speciousness of the application's environmental argument that the PC indicated before. It is proposed to replace 113ha of arable land and woodland with housing for over 3000 people and work buildings for over 3000 employees. The application's suggestion that the insertion of additional trees and shrubs into so busy a site will result in a net positive gain in biodiversity suggests culpable naivety as to how humans and nature interact. As the

PC noted before, the application fails to take the opportunity to compensate for this net damage by ‘creating, enhancing and managing wildlife habitats and networks’ (as required by the SCDC Local Plan) by failing to propose enhancement of the over 100ha of adjacent off-site farm land owned by the Wellcome Trust.

The substitution of some agricultural land with playing fields will increase the net adverse environmental impact of the development. The proposed amendments to the Wellcome Trust’s application do not diminish the extent to which it is in widespread breach of South Cambridgeshire’s 2018 Local Plan. They do not in any way diminish the force of Hinxtton Parish Council’s material objections to the application.

The PC strongly support the research carried out on the Genome Campus, and its growth. But the scale, pace, and character of the proposed development is unnecessary, and it would impose intolerable and largely unmitigated traffic and other external costs on the local community.

Hinxtton PC Comments on Quod’s Response to Parishes (Aug Amends)

1. Compliance with the SCDC approved 2018 Local Plan

Wellcome/Quod present a five-point argument as to their compliance with the approved SCDC 2018 Local Plan. No matter how you cut it, however, the proposed Wellcome Genome Campus (WGC) expansion is not at all consistent with said Local Plan. Approval of the planning application as it currently stands would make a mockery of the Local Planning process.

2. The Transport Mitigation Package

In 2.1 it states that the current Campus Travel Plan has resulted in 55% of Campus employees arriving by single-occupancy vehicle, indeed much better than the 75% that is more typical in South Cambridgeshire.¹ In 2.2 a future target of no more than 40% is identified. This sounds good, but it is specious and misleading, since it is due simply to having employees living on Campus, with no net reduction in modal share for those that would still commute to work on the Campus from elsewhere. More importantly, the total number of vehicles arriving in the morning and leaving in the evening would more than double. Of further note, the added traffic from spouses/partners of Campus-Related Workers living on Campus but working elsewhere – i.e., leaving in the morning and coming back in the evening – or shopping trips, school runs, etc. has apparently not been considered. Deliveries to the expanded Campus businesses and to the residences (e.g., Amazon) may likewise have been underestimated. Based on the target 1,500 homes, these would result in a highly substantial addition to traffic. (See also the comments in our Viability Statement review below regarding potential future non-Campus-related residents.)

We note, however, that the 55% achieved has not changed much over the last several years, despite the Campus’s aggressive transport program, and that it is nowhere near the 40% objective stated in the 2002 and 2006 S106 agreements related to the Campus’s “South Field” expansion.

Further, we continue to question what considerations have been given to maintaining the flow of traffic along the A1301, the major north-south highway linking Cambridge and Saffron Walden. This is a major route used by commuters working in the local areas, as well as by people seeking to access the north-bound M11 and key railway stations for links to London and elsewhere. Wellcome's proposed mitigations are focused entirely on the needs of an expanded campus and completely ignore the local community. Turning the A1301 into a "village road" through the campus, with multiple roundabouts and pedestrian crossings, will severely impede north-south traffic flow and turn local commuter journeys into nightmares. The only realistic mitigation for this is that Wellcome pay for the revision of Junction 9 on the M11, to enable northward on and southbound off access. Comments on the roads / junctions modifications proposed as mitigations are provided below in Item 4.

3. Local Transport Impacts and Rat Running

There is no indication of what, specifically, Wellcome would do to mitigate rat-running problems, should this become more of a problem than it is already. Wellcome is doing precious little about it, even at present.

4. Independent Audit of the Transport Assessment

No details are provided. We remain concerned about the significant queuing on the A1301 at peak times, which is not consistent with the traffic model developed by Vectos in support of the Wellcome planning application. It is also very hard to believe that the proposed relatively simple changes to the McDonald's roundabout and the A505 and M11 J10 to the west would mitigate even the current traffic problems, much less a future substantially increased, Campus-related traffic flow.

5. Proposed Building heights

Reduction of maximum building heights from 16 and 20 m to 11 and 16 m, respectively. (We note that these maxima do not include rooftop utilities, flues, etc.) This is welcomed, but the number and location of the new buildings on the open greenfield farmland opposite the current Campus is still a major concern in terms of landscape. The 15m buildings on the current Campus are not a good comparison, as the current Campus lies generally hidden from view behind mature vegetation (trees and shrubbery) or berms. In addition, the weasel-wording in Item 5.5, "as far as possible" is not particularly reassuring.

Of further note, the proposed new tree belts and screening vegetation are a nice thought, but would take 20 to 25 years to grow enough to provide adequate screening. There is also no apparent consideration whether such vegetation would be evergreen or deciduous; the latter quite clearly would not be particularly effective during winter months.

Item 5.4. We note that the area of open field just to the SE of Hinxton village that lies on the NW side of the Expansion Land is now planned as sports fields (with lights, fencing, changing rooms, parking, etc.), which are rather different from the farmed ground or fallow meadow that we were originally assured would be the case.

6. Additional Landscape Visual Viewpoints

Item 6.2. Further analysis of three of the additional viewpoints requested is stated to be contained within the Revised Volume III of the Environmental Assessment. The view of the expansion land from Coploe Hill provided by Hinxtton last Spring (below) has apparently not been considered. In this northward-looking photo the buildings on the left are on the current Genome Campus, and the highway on the right is the A11. The proposed Campus expansion would be on the large swathe of field and tree belts between the two. The visual impact would be considerable. (We note that S Cambs' own landscape consultant considered that it would be impossible to mitigate the impact of the Campus expansion from surrounding higher viewpoints.)

Also with regard to landscape, the grounds for S Cambs' rejection of the SmithsonHill AgriTech business park are equally applicable to the Wellcome project.

See representation ZZFMRZLW, file reference 1154450-854439.pdf, submitted to this planning application on or about 22 January 2019.

7. Biodiversity

The appearance of weasel-words such as “where feasible” is not reassuring.

8. Flood control and aquifer protection beyond the site boundary

We continue to believe that construction of a compound weir on the River Cam would provide flood protection for the historic Mill and Miller's Cottage as well as upstream flood protection for the existing Genome Campus itself (which has not been immune from flooding over the years). Such construction on the part of Wellcome would also be well received by Hinxtton village as a gesture of good will, as was the recent replacement of Wellcome's “Iron Bridge” upstream of the Mill (although it took three years to convince Wellcome that they should do it).

9. The change in the balance of activity on the Genome Campus

With the development of the small Biodata Innovation Centre as an incubator for commercial start-up companies, a creeping commercialization of the Campus has begun. With the proposed Campus expansion to include in large measure not only more “grow-on” companies but also larger, established commercial entities, that creeping commercialization becomes a galloping one, turning the predominantly charitable and non-profit academic nature of the Campus into a genome-focused commercial business park. Indeed, we have been told that a “large multinational corporation” has expressed great interest in establishing a major presence on an expanded Campus. John Sulston and Fred Sanger, were they still alive, would be horrified. Such on-site co-location of similar businesses, as noted by South Cambs in the recent AgriTech appeal hearings, is not necessary for commercial success; the concept of a regional cluster of such technology and businesses, on the other hand, is more appropriate and very highly effective, as has been amply demonstrated in the cases of biotechnology clusters in the San Francisco, San Diego, and Boston areas.

10. The proposed housing

The sheer size of the development – 1,500 homes and 3,000-odd people– would dwarf Hinxton (about 150 homes and 300 residents) and would be larger than the three local villages (Hinxton, Ickleton, and Duxford) combined, comprising about 900 homes and 2,800 people. This is by far the largest proposed development impact on any such villages known in Cambridgeshire; it is unclear how Hinxton and local villages would survive such massive change, or in what form they would continue.

It is worth noting, moreover, that a good share of the new homes in Helixton (an appropriate moniker for the new Campus town, we think) would house Campus-Related Workers with short (e.g., 2-year) contracts, resulting in a relatively transient population. How does this help to establish a sense of community? There also continues to be virtually no discussion in the planning application as to the impact on the governance of Hinxton Parish. Indeed, we note that – in a meeting some months ago between Hinxton Parish Council, Wellcome’s Director of Planning and SCDC’s Planning Officer – Wellcome’s Director of Planning commented that the “usual” thing under such circumstances would be that a new Parish was formed. This suggests that Wellcome has no intention to integrate the campus community with local parishes, and is indeed focused on creating a genomics ghetto in our local countryside.

Wellcome (through Quod) makes a big deal out of the fact that “100% of the new housing” would be dedicated to Campus-Related Workers, i.e., at least one person in each residence having to work on Campus. However, on reading the proposed “Draft Lettings and Sale Policy” (referred to but not included in the Draft Section 106 Heads of Terms, and provided to us only as an afterthought upon request) one finds that this “100%” statement may be disingenuous. There appear to be gaping loopholes that would allow families or individuals not meeting the Campus-Related Worker criterion to live on Campus. Additional evidence of such loopholes appears buried in the Quod Viability Statement, Appendix D, where it says “a restriction will be applied to require that on resale, units must be offered within the Campus for 6 weeks **prior to being offered to the wider market**” (emphasis ours).

With this plus other comments above and below is it any wonder that the local villages have lost trust in the Wellcome Trust? We would have hoped for more honest and forthright representations at this stage of the proposal.

For clarification, Hinxton Parish Council continues to take the view that the Wellcome Genome Campus should follow the model operated successfully by the Stanford University campus (California, USA), under which all housing is sold or let to campus workers only. Wellcome has made the case that the housing is necessary to continue to attract the best international scientists. Any proposal that in some circumstances housing could be offered on the open market is therefore contrary to one of the fundamental principles that Wellcome has put forward for expansion of the campus and shows just how disingenuous Wellcome has been in this application.

Additional comments on the proposed housing are included in our separate Response to Quod Viability Statement. What is the real intention as to housing policy, and how, exactly, would it be managed and enforced?

11. Meeting community needs and engaging with the local community

Issues of transience and local governance, as noted above, are still not addressed in the planning application. This is a major failing.

Contrary to earlier promises, the proposed Fitness Centre now appears to be off-limits for non-Campus people such as residents of Hinxton. This is an appalling indicator of Wellcome's intentions. Item 11.5 says nothing about how Hinxton village is to be integrated into Helixton (or vice versa) in a social sense. We have commented above that Wellcome's intention may be to create a campus that is quite separate from and not at all integrated into the local community.

11.6 "The existing Campus already includes spaces and services that **may** (*emphasis added*) provide for opportunities to accommodate the needs of early phases of the development, avoiding some of the challenges of isolation that can be experienced by new communities where there is no existing infrastructure in place." Again, some weasel-wording. Also no mention of Hinxton village. The statement as a whole (and "challenges of isolation" in particular) could be a bit disconcerting for potential residents on the expanded Campus.

11.4 The size of the potential "community hall" is "up to 350 sqm GEA." This seems rather inadequate. The current Hinxton Village Hall, serving about 300 residents, is about 160 sqm and often struggles to handle larger village functions. Helixton will comprise ten times more people and might need something larger . . . (Do the maths.)

12. Public Consultation

The public consultation process on the proposed Campus expansion over the past year or so has been well attended; many deep concerns about the scale and type of expansion, particularly landscape, traffic, and the commercialization and new housing aspects, were expressed from residents of Hinxton and surrounding villages. Few of those concerns have been addressed in any meaningful way. The general impression has been that Wellcome (London) will do whatever they want to do in Hinxton and that Hinxton, the local villages, and South Cambs can't stop them. Their general arrogance and condescension toward us, as well as their seemingly bullying attitude, is remarkable and not befitting a charitable organization of their reputation.

Many of us acknowledge and deeply respect the contribution that the Sanger Institute and the EBI have made to genomics research and knowledge and, in addition, to science and humankind in general. Their worldwide reputation is well-deserved. The charitable support from the Wellcome Trust in this regard is exemplary. We take vicarious pride in having those institutes at our doorstep.

We believe that the local villages are not opposed per se to a modest expansion of the Campus involving an increase in size of the current charitable non-profit genome-related research as exemplified by the Sanger and the EBI and/or a third such research institute. A modest increase of space for fledgling commercial start-ups would also be within reason (all of which, of course, with appropriate attention to and improvement of local infrastructure, in particular roads/transport, pedestrian/bike paths, landscape, biodiversity, etc.). The third research institute has indeed been mentioned by Wellcome from the beginning of the Campus expansion project, although there has been little information as to what this might entail. There has instead been much more excitement on their part about the proposed massive increase in commercialization of the Campus and the associated new housing.

Other comments

We are in full agreement with and support the views of the Ickleton Parish Council as outlined in Terry Sadler's representation of 6 September 2019 and the views of the Little Abington Parish Council of 17 September 2019.

Hinxton PC Response to Viability (Aug Amends)

Comments on the Viability Statement

Wellcome's contention is that the housing is needed to provide for existing demand and, in particular, that associated with the proposed development, but this does not seem to be supported by their residential advisors. The Viability Statement includes a claim which makes a mockery of the overall argument for the inclusion of over 1,500 homes. Paragraph 4.9 *Residential Sales Values*, states that the baseline viability assessment which has been "informed by detailed analysis by BNPP Real Estate" adopts a blended value of £407 per sq ft. It then states "*The £407 psf value includes a 10% discount recognizing the volume of supply of units to a **very constrained** market and the affect this will, in their professional view, have on pricing*" (bold emphasis ours). This statement would seem to undermine the whole principle of Wellcome's argument that there is a need to include the residential accommodation.

In relation to the specific assumptions in the Viability Statement, we have taken advice from a number of relevant professionals and would make a number of comments:

1. Firstly we find it very surprising that Wellcome is seeking to argue that the development produces a negative market value of £110m based on market assumptions. It is a relatively flat greenfield site located in a prime South Cambridgeshire location with correspondingly high commercial values and rents and residential capital values of £450 per sq ft. If this land really did have a negative land value, then it would call into question the viability of every site across the district and most of the country.

However, if the 'bulk' discount contained in the baseline appraisal is ignored (as per the "Placemaking Appraisal") and an appropriate current land value is adopted (see comments).

below about the Benchmark Land Value), the residual land value for the site becomes positive, as one would expect.

2. Assumptions that need to be challenged by SCDC include:

- The £110m negative land value is inflated by the assumption that the starting position, or the '**Benchmark Land Value**' is £58m, equivalent to £500k per hectare. This appears to pre-suppose that the land has some planning status, such as an allocation in the Local Plan. It does not, and the current land value should be based on agricultural use, meaning the Benchmark Land Value (having added a premium to entice a sale) would be perhaps £40k per hectare, or around £4m. This would clearly halve the negative residual land value. (Note, we are struggling to understand why the BLV is £58 in the Baseline Model and £62m in the Placemaking Model, albeit the approach is incorrect in both.)
- The £310m allocated for infrastructure looks unbelievably high and requires full justification. We note an 'Indicative Construction Cost Estimate' has been provided by Gardiner & Theobald but this requires detailed analysis. If Wellcome is suggesting that the infrastructure costs are exceptionally high because they are seeking to create an exemplar campus then the valuation assumptions should correspondingly be adjusted. Cushman & Wakefield's report states (page 85) "*At this stage we have not applied any premium for the attraction of working on the Genome Campus which we anticipate could be achievable if the masterplan creates 'The destination' for Genomic companies*". If the appraisal is assuming market rents and values then the infrastructure costs must correspondingly be based on market rates.
- The ratio of net to gross space for the residential accommodation is assumed at 81%. This would be low in relation to the provision of houses (where values and prices are normally quoted off GIA), as opposed to flats, and should be checked against the housing mix.
- The finance rate adopted is high at 7%. Consultants are currently using 5.5%, which still represents a 4.7% margin over the current 10-year fixed interest rate ('swap rate') of 0.8% so would be sufficient to also cover financing fees.
- Letting and sale fees have been assumed at market rates, but they will be much lower for a scheme of this scale.
- Similarly, the appraisal assumes Land Acquisition Costs of a standard 6.8%. Whilst this may be market standard, these costs are unlikely to be incurred by Wellcome as they already own the land, so they should not be included in their analysis.
- Wellcome is suggesting that there will be significant demand for the commercial space, and it would seem likely that pre-lets will be agreed for the buildings, particularly due to the specialist requirements of potential occupiers. We appreciate figures have been provided by

Cushman & Wakefield, but the valuation yields adopted for the pre-let elements appear conservative.

□ Similarly, the values of the residential rental accommodation appear low, particularly if Wellcome funds the buildings by selling an overriding lease on the blocks to third-party institutions. This would then allow Wellcome to control the letting of the individual units to Campus staff. This is a typical student accommodation model and valuation yields on such an income stream would be in the order of 3%, providing a much higher value for the rental elements than assumed in the Viability Statement.

□ To properly form an opinion on the Viability of the scheme, Wellcome needs to explain how they propose to fund the development. Whilst Wellcome may argue that they are adopting market standard assumptions, they are proposing special circumstances to justify the application, so this must extend to explaining how the scheme will be delivered and controlled in the future. We note that Cushman & Wakefield specifically state that they have been asked not to comment on this as extracted below (page 90), but they acknowledge the importance of the point. This is also particularly prescient because the application is being promoted by the financial/investment side of the Trust, rather than the charitable scientific/medical research side.

3. Sales and the link to Campus Workers

□ Whilst again we are (and have been) very uncomfortable with the proposed inclusion of a large number of housing units on an expanded Campus, we suggested at the early public consultations in winter/spring 2018 that if the new housing were allowed to happen an appropriate model to follow would be that employed by Stanford University (California, USA). In brief, the University retains ownership of all the land, but houses built on that land may be owned and occupied by Stanford-associated people, but only Stanford-associated people. If the owner/occupier leaves their association with the University they are given 12 months to vacate and sell their residence, but it must be sold to another Stanford-associated person. In no case are any of these on-Campus dwellings allowed to be sold or rented to non-Stanford people.

□ This model was apparently adapted by Wellcome for the proposed Genome Campus expansion, at least in part. They claim in their Housing Statement, for instance, that “100% of the housing will be for Campus-Related Workers”. The devil, however, appears to be in the detail.

□ The comment below contained in BNP Paribas Real Estate’s letter dated 15th March 2019 is a very major cause for concern.

□ The suggestion that units would be offered to the outside market after only 6 weeks of marketing to Campus staff is ludicrous and will effectively mean that there is no long-term tie to the Campus. The scheme proposes to build relatively small units, which people are likely to outgrow. Additionally, many staff on the Campus are reportedly on relatively short (e.g., two-year) fixed-term contracts and are thereby relatively transient. The combination of these factors will mean that turnover will be

relatively rapid; units would be traded more frequently than a settled town or village. It is likely that in as little as 10 years many of the units would be occupied by people with no relationship to the Campus. Yes, “100% of the housing would be for Campus-Related Workers” at least initially, but likely not for long.

□ Note, too, that the sale or letting to non-Campus parties would negate the argument put forward by Wellcome that the on-Campus housing would mitigate the traffic impact of the proposed Campus expansion. In fact, the housing would have the opposite effect to the argument currently being put forward – non-campus workers who had bought the re-sold units would be commuting to their work and workers on the expanded campus would be commuting to the campus from further afield, creating double the traffic impact compared to a scheme with no third-party housing included.

□ If any residential accommodation is approved in the Campus extension it must be tied to Campus staff **in perpetuity**. Units must be controlled and managed by Wellcome; the accommodation should therefore be available for rent or sale to Campus staff, at discounted rents or sales prices if Wellcome so chose. We would also submit that upon leaving association with the Campus a 60-day requirement for renters to vacate and a 6- or 12-month requirement for owners to sell would be appropriate.

4. Viability Conclusion

□ We appreciate that the purpose of the Viability Statement has been to justify Wellcome’s aim to avoid the Council’s requirement for traditional Affordable Housing to be included in the scheme. They have accomplished this with a financial argument claiming the scheme to be barely viable, alongside the argument that there are exceptional circumstances relating to the need to provide accommodation for Campus-related workers. We can understand that. The Viability Statement, however, is not based on sound assumptions; we would urge SCDC to challenge many of those assumptions. We suggest that a proper appraisal would show that it would be financially viable to provide an appropriate “developer subsidy” (para 4.4) including Affordable Housing, if required. Their argument, then, rests only on the “exceptional circumstances” of providing housing for Campus-related workers. If this is the case, then the accommodations must be 100% tied to the Campus, in perpetuity.

□ In any case the scheme would create ample surplus to fund an appropriate develop subsidy for any required local infrastructure as well as mitigating offsite contributions to Hinxton and other local villages.

Hinxton PC S106 Request (5 Sept)

We write with reference to the letter which William Brown, then Chair of Hinxton Parish Council, sent to you on 4th February 2019 (“the February letter”; attached for reference). This concerned Hinxton Parish Council’s Section 106 mitigation requests in respect of the Wellcome Genome Campus outline planning application S/4329/18/OL.

In that letter, three broad areas were highlighted for mitigation under S106 provisions:

1. Environmental mitigation
2. Community Facility mitigation
3. Traffic mitigation.

Here, we wish to re-affirm the contents of the February letter and – following our discussions with you and Tom Clarke (including a site visit to the village hall) and together with wider village consultation – to provide additional detail particularly in regard to Community Facility mitigation, as well as some further remarks on Traffic mitigation.

1. Environmental mitigation. We note in recent documents that the Wellcome Trust considers funding for a compound weir to fall outside the scope of S106. We remain of the view that such a weir will serve to alleviate potential flood risks arising from the proposed development – on the Genome Campus and in downstream villages – and request that Wellcome consider this further, whether within the framework of S106 or outside it.

Whatever the ultimate determination of this point, we wish to reiterate and reinforce here the two other requests we made under Environmental mitigation. The Wellcome Trust is proposing to build across vast swathes of countryside and wildlife habitat, and we consider that this should be mitigated by definitively setting aside other land they own in the Parish for the purposes of creating/retaining parkland areas for the enjoyment of residents and others, as well as protected wildlife zones. These points were set out in the February letter as follows:

- Safe footpaths and safe cycle paths and associated bridges, in addition to those planned for the functioning of the site, should be provided, both for recreation and wider access, across Wellcome land towards Great Chesterford, Ickleton, Whittlesford Parkway, Duxford and Sawston
 - The Wellcome Trust should be required to commit to improving and extending environmentally responsible management of all the farmed land it owns around and within Hinxton with a view of meeting World Wildlife Fund ‘Living Landscape’ standards within ten years.
2. Community facility mitigation. Consultations with members of the village indicate that our village hall facilities – including the playground – are accessed and used by significant numbers of Genome Campus employees and their spouses and families. We project that such use will increase markedly in the future, as campus numbers increase, and is likely to do so until such time as full facilities may be built on an expanded campus site.

With this mind, we consider there is a need to:

- a) Increase the amount of recreational space available within the village
- b) Enhance the recreation facilities available

- c) Renew or improve Hinxton village hall and its facilities
 - d) Increase the car parking space available.
- a) Recreational space. We request that Wellcome dedicate for public use the ‘L’ shaped piece of land adjacent to the village hall in the heart of the village and extending down to the river, to protect and enhance the existing historic site and to make more space available for community and recreational use. This might include a “village green” area for community activities and social gatherings.

We anticipate that Wellcome will retain ownership of this land and will maintain it.

- b) Recreational facilities. We request that Wellcome – in consultation with Hinxton Parish Council – provide additional facilities on this expanded recreational space, for example to encourage outdoor activities and sports for children and adults. This may include separate playing fields and an enlarged playground area.

We further request that a part of the enlarged recreational space – perhaps close to the river – be set aside as a meadow area to improve biodiversity. We also request an orchard area with local fruit trees including damson, plums and apples. These requests reflect the wishes of the village to help mitigate the environmental impacts of the proposed Wellcome development – as outlined above – and to provide resources to inform and educate young people.

- c) Village Hall. Reflecting the anticipated increasing usage of the village hall associated with an expanded Genome Campus, we request that Wellcome provides a new village hall for Hinxton village. The current village hall is small and has significant limitations, not least as a result of its age and associated structural/maintenance issues. It is not able to manage increased capacity.

A new village hall could potentially be on the same or an adjacent site in the centre of the village. Consultations indicate that villagers would wish this to be in keeping with the size of the village (e.g., to seat up to 150–200; to provide additional storage, e.g., for chairs and tables, and archival village documents; with a modern kitchen and toilets; with good access for all; and meeting current regulations). Villagers would want a new village hall to be architecturally sympathetic to this conservation village and to be environmentally friendly. The interior should be adaptable for multiple uses (for example with the potential to be divided into multiple spaces; stage; sports facilities; office space; etc.)

Alternatives to a new village hall would be to extend or refurbish the current building. These may not be optimal, inasmuch as they would retain the limitations of the current village hall. Extension or refurbishment would require amongst other items the following:

- Rendering all brickwork and altering the main access from the front to the rear of building
 - Replacement and double-glazing of all windows
 - Improvement and insulation of roofing
 - Replacement of flooring and introduction of under-floor heating
 - Installation of air-conditioning
 - Installation of a sound/public address system
 - Upgraded lighting
 - Improved and potentially relocated kitchen
 - Disabled access and toilet facilities
 - Additional storage areas/facilities
- d) Car parking. Parallel to these improvements is the requirement for additional parking, which should be proportional to the size of the village hall, with safe road access. This would require additional land adjacent to the village hall.

Separately, we note that there are an increasing number of cars parked in the south of Hinxtion High Street, adjacent to the Genome Campus. We understand that these are mostly cars belonging to employees of contracted campus services, such as the creche/nursery. We request that Wellcome evaluates the provision of additional parking facilities at the north end of the Genome Campus, potentially with a separate access point from the A1301 (rather than from New Road/Ickleton Road), to alleviate this growing problem.

3. Traffic mitigation. We reiterate the points we made in the February letter and add the following points of detail:

- Wellcome has proposed a series of highway improvements as mitigations for the increased traffic expected in the Hinxtion area due to their massive planned expansion of activity and population on the Campus. These mitigations include modifications to the A505/A1301 roundabout, modifications to the A505 and Junction 10 of the M11, new roundabout(s) and roadway changes on the A1301 next to the current Campus, etc.

As we have indicated previously, we do not consider these proposed mitigations to be sufficient to deal with the massive increase in traffic resulting from the proposed campus expansion, but we would nevertheless request that these (and any other) mitigations be completed before any other Campus expansion work takes place, in order to minimize the traffic impacts on local communities.

This will serve to demonstrate goodwill and proper intent from Wellcome to the local villages, and is consistent with the philosophy that Wellcome has itself previously stated of providing appropriate infrastructure before rather than after it is needed.

Ickleton Parish Council

Original Comments

Objects: recommend refusal and make the following comments:

Observations on Community Involvement and Consultation by The Wellcome Trust

The public exhibitions staged on the Trust's behalf, with the exception of the final exhibition in late October 2018, were misleading and effectively concealed the size and scope of the Campus Expansion plans from local communities. The exhibitions were poorly attended. Questions posed to obtain feedback were weighted towards securing particular views. The Expansion is being imposed on local communities and the local area with little regard for the impacts that it will have if approved.

The proposals would have adverse impacts as severe as the others in the area and, moreover, if accepted, could set a precedent for those other proposals to the detriment of the open countryside in the area and the well-being of the community.

Wellcome refers to having met with the Cambridgeshire Quality Panel who supported Wellcome's ambition for the Proposed Development. The Parish trust that elected and accountable Councillors will have more regard for the communities they represent and not support proposals that have no regard for the Local Plan.

Failure to comply with the Local Plan or engage with the Local Plan process

There is no provision for the Expansion Site to be developed as a very large employment location, or for housing, in the Adopted South Cambridgeshire Local Plan (September 2018). The proposal should come forward as part of the next Local Plan process. The proposal is in breach of policy E/16 of the Local Plan. Little consideration appears to have been given to intensifying development on the Existing Campus Site.

Addressing the Case for Growth

Wellcome is seeking to maximise its return from its investment in land opposite Hinxton by opening up the commercial potential that changes of use would bring. The Trust should not be using its successful research Campus as a cover for massive commercial development that would radically alter the character of this part of South Cambridgeshire. Growth at any cost is not acceptable.

The Application represents a marked shift of intent from the current Campus activities involving not-for-profit genomics and biodata research towards commercialization. It is not accepted that co-location of grow-on or established third party concerns with the basic research activities in an expanded Campus is a prerequisite for successful translation of research findings into commercial applications.

Locating grow-on and established businesses near to the Genome Campus is perfectly feasible given the number of business parks nearby with room for expansion. The suggested occupational controls are not sufficient and are time limited. This could be just another business park.

Adverse Impact on the Countryside and existing Built Environment

The Existing Campus does not cause widespread damage to the local landscape and has widespread tree cover. The intended development on the Expansion Site is insensitive to the countryside, to Hinxtton village, and to the Existing Campus and its buildings. The density of development is greater, and many of the buildings are higher, than the Southfield buildings. There are no buildings on the Existing Campus up to 16m high. There is no design justification. There is no indication of any intent to site any storeys of the research and translation development or the car parks on the Expansion Site below ground level. Views from Ickleton will be harmed by multi-storey car parks and buildings.

The height and density of the housing elements bear no relation to the pattern of development in Hinxtton. The housing will be highly visible across the open fields along the A1301, higher than the intended tree screen and more visible in winter.

The design of the development for the Expansion Site is uncompromisingly urban in nature, illustrated in the relationship with the A1301. The artist impressions are misleading. There will be severe light pollution from the residential units as well as from the dense and tall urban area of the research and business area and car parks.

The proposals are nothing short of a brutal imposition onto open undeveloped landscape and are contrary to the NPPF. The proposals fail to respect or retain the local character and distinctiveness of the local landscape. The Expanded Campus would extinguish the views and there would be a major adverse impact on local character in the vicinity of the proposed development. That impact would be felt much more widely than in local communities.

-Viewpoint 7 Coploe Hill Ickleton. The road itself is popular with walkers (not just motorists) and cyclists, being part of National Cycle Route 11. The viewpoint chosen with the buildings of the proposed development simply fails to convey the true adverse impact of the development on the view. It would be extremely prominent in the landscape, filling up much of the centre of the view from Coploe Road. Alternative viewpoint suggested. Policy E/18 is breached.

Loss of Best and Most Versatile Agricultural Land

The proposal is contrary to NNPPF para 170, and LP policy NH3/1 and would lead to the irreversible loss of Grades 1, 2 or 3a agricultural (54.3ha of the Expansion site is best and most versatile (BMV) agricultural land). The case for development of this finite resource is not strong enough to justify approval of this Application.

Biodiversity Requirement not likely to be met

The Biodiversity Chapter (ES Vol I Ch9) is little more than a box ticking exercise. A fragmented habitat will ensue which will not support the less common species. Barn owls, badgers, skylarks, brown hares and grey partridge are sensitive to disturbance. An eleven year construction period involving these development proposals will have a catastrophic impact on these species. Farmland species will not survive and thrive in the transition from a rural to an urban environment. Bat boxes may be installed on the housing units, but bats will not have sufficient foraging areas, neither will they

appreciate light and disturbance on a housing estate for over 300 people. Bird boxes will do no more than attract the usual garden and woodland edge species. Green roofs and walls, and new ponds are hinted at – “where feasible”. The absence of commitment suggests. Wellcome is paying lip service to biodiversity. The proposal is contrary to policy NH/4.

Why Local Communities object to the Housing Element of the Proposals

The residential units would be contrary to adopted policies H/1, S/7 and S/11. The reasons for the rejection of the site to the north for a new settlement/housing at an early stage in the formation of the Adopted Local Plan applies to the Wellcome site. The suitability of this site for housing should be considered as part of the early Local Plan review.

The prime driver behind the inclusion of housing is financial. The investment arm of The Wellcome Trust is intent on maximising its return on its investment in the agricultural land of the old Hinxton Hall Estate. Reference is made to Hanley Grange Eco-town Project. The application is in essence Hanley Grange Mark II.

There is to be no social housing or otherwise “affordable” housing, despite the fact that there must be some Campus employees, or workers under contract, that are low paid.

Housing at market rates means there is no incentive for employees to choose to live there as opposed to one of the local villages or in Cambridge. Campus partners would commute out. The accommodation will be tied to a Campus job and will act as a deterrent to choosing a Campus unit. The unattractive proposition of a unit on Campus to the would-be owner/occupier will lead to the vast majority of units being developed and let. Wellcome will seek a relaxation of the ties once built.

The Application contains unsupported assertions that living on Campus would be attractive to significant numbers of staff, particularly to young people. Most people have no desire to live as close to their working environment as Wellcome claims. Staff attitudes towards living on Campus are an unreliable guide to the attitudes staff working on the Expansion Site in future might have.

Medical Services

Many residents of the existing communities are registered with Granta Medical Practice at Sawston. It is currently difficult to see a GP. 1.7 FTE GPs will be needed to serve the needs of the residential part of the Expanded Campus on completion. There is claimed capacity for expansion at Sawston, but there is an apprehension that medical services to existing residents will suffer further and will face even longer delays in seeing named GPs.

Impact on Duxford Primary School.

Ickleton fear that the School would not be able to cope with a significant influx of additional pupils without compromising the education of existing pupils. Impact on the community of Hinxton. Hinxton’s population is 320 occupying c.130 dwellings.

Wellcome's residential aspirations are 3021 in 1500 units. Social issues will arise. Serious issues around governance and local representation have not been considered.

Traffic, Transport and Roads

Rat running through Ickleton and Duxford villages not given proper consideration. The issue of vehicles rat running via Ickleton is a major concern for residents. The current level of rat running in Ickleton and Duxford is having an adverse impact on the quality of life. A development that would add to the problem cannot be viewed as sustainable and permission should be refused.

Rat running results in disturbance from noise and vibration, and sensitivity is increased by factors such as narrow streets, narrow or non-existent footways in the village. The streets exposed to rat running are in the main in the conservation area, a feature of which is that houses – many of them timber framed listed buildings – are set right on the highway. Rat running is accompanied by poor and unlawful driver behaviour; widespread speeding; verges and footways are frequently driven over; verge posts dislodged; confrontations between drivers; and poor air quality. Congestion and delays on the A505 and the A1301 have led to significant numbers of drivers avoiding these roads and using unclassified rural roads to access or depart from Junction 10 of the M11.

In October 2014 Ickleton commissioned a traffic survey that recorded vehicle movements which are summarised in the PC response.

The Parish do not accept that the ANPR exercises carried out on two days were sufficient properly to establish the extent of rat running. The reliability of the evidence is questioned.

Displacement caused by A1301 redesign will lead to increased rat running

Slowing down traffic on the A1301 alongside the Expanded Campus will increase rat running in local villages.

There is no calculation of the cumulative effects the A1301 changes will have on journey times and how this will add to congestion. Wellcome's Traffic Studies are inadequate and conclusions are not well founded. The picture presented by consultants on Wellcome's behalf fails significantly to reflect the reality of conditions on the local road network as experienced by residents of Ickleton, Duxford and Hinxton, users of those roads from further afield, and naturally by Existing Campus workers, on a daily basis.

There is nothing in the mitigations put forward that could be considered to be a convincing game-changer that might reasonably be expected to make a real difference to the local road network. The changes, with the exception of those on the A1301 to suit Wellcome's own purposes, are purely cosmetic in nature and will not address congestion and its consequences that would be made worse by this development.

Other Factors suggesting the Traffic Assessment is not adequate

The Existing Campus Travel Plan is rightly valued by local communities. The Plan has never hit its target of car based trips to Campus by staff. 55% of Campus staff coming to work by car is a significant achievement given that it is lower than the South Cambs average of 75%, but modal share has remained at 55% for some time. The intended shift to 42.5% is over-optimistic.

The assumption that staff of commercial partners on the Expanded Site will in future commit to the Campus Travel Plan to the same extent as research staff on the Existing Campus cannot be accepted without challenge. Assumptions about the level of car movements on and off site related to the residential units seem to be on the low side. Insufficient account is taken of car trips by partners, who are not likely to work on Campus.

Traffic Studies lacked Alternative Cumulative Effects Assessments

The Parish fail to understand why the Applicant has not been required to include alternative Cumulative Effects Assessments in the Traffic and transport Assessments.

Summary: Parish Council Conclusions on Traffic

- Existing problems of congestion on the local road network are not adequately recognised or assessed. Concerns of local residents have been brushed aside.
- Impacts of the proposals are not adequately recognised or assessed.
- Mitigation measures are not adequate.
- The Applicant is required (Local Plan Policy T1/2) to demonstrate adequate provision to mitigate likely impacts (including cumulative impacts) of the proposals. The proposals should not (in themselves or cumulatively) have a significant impact in terms of the amount or nature of traffic generated (Policy E/16 Expansion of Existing Businesses in the Countryside). The Applicant has failed to meet these requirements and the Application should be refused.

Overall Conclusion

The Application fails to comply with the Adopted Local Plan 2018 in very many respects and the Proposals are not suited to and are unsustainable in the intended location.

The application is opposed and recommended refusal by South Cambridgeshire District Council.

Amendment Comments to April Submission

Objection Maintained:

A1301 etc. Amendments

These amount to minor changes to the roundabouts and design of the proposals for the Highway. This is creating a greater hazard to cyclists and other road users.

The other amendments seem designed to make this A road even less attractive to drivers and the addition of new or enlarged roundabouts, new crossings, a new junction and a reduced speed limit all remain to impede through traffic.

This will lead inevitably to increased rat running through Ickleton and Duxford. The offer of a future fund (amount not specified) to address unforeseeable consequences, when adverse consequences of their proposals are clearly foreseeable, is hardly reassuring. Requirements of County Council Highways Officers to make the A1301 safer have the unfortunate consequence of increasing the urbanising effect of these proposals.

The degradation of the locality in this respect is unacceptable. The change in the nature of the A1301 from a rural highway to a multi-modal street is unacceptable. The revisions do not reduce previously expressed concerns regarding traffic and transport assumptions.

Landscape Impact

The reduction in maximum building height from 20m to 16m is noted, as is the reduction to 11m for buildings in certain areas, but there is no commensurate reduction in the overall scale of the project – it follows that the density of the Expansion Site would become greater than before. The impact on the landscape is not materially reduced.

Existing buildings on Campus at present do not exceed 16m. The proposals as amended would place a dense block of buildings, a design pattern quite unlike that which exists on the present Campus, on rising land, on a footprint several times greater than that of the large buildings on the Existing Campus. In Hinxtton there are no buildings higher than 8m with the exception of the Parish Church. The buildings intended for the Expansion site remain unacceptably tall and are out of scale with the location.

The density of the buildings proposed for the Expansion Site contrasts sharply with the way the Existing Campus has been planned and designed. Planning permission was sought for recent additions to the Southfield site on the basis that spaces between the buildings would permit views to countryside beyond. The density and heights intended for the Expansion Site signal abandonment of any attempt to be in scale with or sympathetic to the location.

The additional visualisations simultaneously manage to understate the impact of the proposals on the landscape through the use of creative photography yet at the same time it can be seen that the impact of the proposals remains massive. In particular the Coploe Road viewpoint representations establish that, whereas the Existing Campus may be viewed as a prominent feature in the landscape, the Expansion site would, if permitted in its present form, become the dominant feature in the Cam Valley as viewed from Coploe Hill.

SCDC has rightly expressed reservations based on landscape impact about proposals for the North Uttlesford Garden Community. This would be located on high ground (some of which can be seen in the Coploe Road visualisations) to the east of the Expansion Site. Similar reservations should arise in relation to proposals that would fill in the Cam Valley floor. There is also the risk of cumulative impact from these two proposals and at least one other major development proposal in the locality, which should be given full consideration as a matter of urgency.

Increased Loss of Agricultural Land and Potential for Increase in Biodiversity

Part of fields previously to be left as arable farmland on the basis that this addressed concerns arising in Hinxton Village is now to become playing fields. If changes are made at this stage to lose more Best and Most Versatile agricultural land it only arouses fears of what may happen following the granting of outline permission. This is a neat illustration of just how insensitive to location and neighbouring villages the expansion plans are in reality. The Wellcome Trust's drivers for growth on its own terms will always simply trump everything else.

Turning agricultural land into playing fields punches a hole in the claim that the proposals would increase biodiversity. Closely mown grass used for the playing and viewing of games will diminish undisturbed biomass and biodiversity. The claim that the proposals will result in increased biodiversity has never been well founded. 113H of undeveloped arable land and woodland will be occupied by housing for more than 3000 people, and their dogs and cats, and by densely sited massive work buildings for more than 3000 employees. Not to mention visitors to the hotel and conference centre and other planned buildings ancillary to the residential and work buildings. Or the visitors to the publicly accessible open land that the proposals promise to deliver. The intended site is one that would be very busy and densely developed – the interaction of nature and so many human beings on the Expansion Site is not likely to result in a win for nature.

Sustainability Update: Water Use

A mixed development of the type proposed by the Wellcome Trust has a massive requirement for water. This area is historically the driest in the UK with an average rainfall of 22ins, similar to Morocco. However, in practice, 90% of the annual total is rarely achieved.

In 2018 75% of the projected rainfall was received and the year ended with a deficit of 6ins. Water abstraction from the rivers for irrigation of crops was not allowed at any time in 2018, and borehole abstraction was stopped part way through the growing season. This year, between 1st January 2019 and 1st May 2019 only 40% of the projected rainfall was received so the deficit is nearly 10ins in total, or half a year's rainfall! These figures are part of an ongoing trend towards drier weather patterns. Water, like land, is a finite resource and the PC must question the sustainability of any large development in this area. This is a concept which apparently receives scant consideration from planning authorities –SCDC is urged to be an exception and require the Wellcome Trust to explain in full detail how their development will be sustainable in this respect before permission is granted.

Comments on Aug Amendments

Please note that Ickleton Parish Council continues to maintain its OBJECTION to this Application.

We emphatically recommend that the Application be refused. We assume it is not necessary to reiterate the points made in our letters of 03 February and 27 September 2019. These are not addressed to any significant extent by the Applicant.

You have also had an email sent on 05 September 2019 on behalf of this Parish Council before the more recent extension of the time limit for responses to the August Material. We are grateful that more time to respond was allowed.

The Housing Element

We have previously set out concerns about the housing element of the proposals and commented on the Quod document in the August Material in our email of 05 September.

We have become aware of a further Quod document dated 22 August 2019 that should be read in conjunction with the Quod document that was submitted to SCDC in the August Material. This further document bears the title Wellcome: Draft Lettings and Sale Policy.

This document indicates several instances in which properties would be let or sold, or sub-let, to Non-Campus Related Employees. It is even suggested that if there is a short delay in letting or selling to a Campus Related Employee, the definition should be widened to include employees of other Science Parks within a certain (undefined) distance.

Housing is either 100% dedicated to Campus Related Employees, or it is not. Exceptions should be rare. It is evident, even at this stage in the planning process, that the Applicant envisages many instances where this principle may be breached. How long after construction will it be before the Wellcome Trust approaches the LPA seeking to further reduce restrictions on occupation, or even to remove all such restrictions? We submit that the risk of this happening is significant.

The August Material fails to address the concerns of the three communities closest to the Expanded Campus about the adverse impacts that a new settlement equal in size to all of them combined will have on them. The situation of Hinxtton going forward is a particularly unhappy one. A community of 300 is to have a close neighbour with a population of ten times that number. Residents of that community will reside in tied accommodation, with the employer (possibly each household's major source of income) owning much of the land in Hinxtton Parish. The Campus based electorate will be many times the number of the existing electors of Hinxtton. Any planning application that comes forward in future from the Wellcome Trust relating to land in Hinxtton will within a short time be determined with the existing Hinxtton community having no more than a minority say. There is no proposal or discussion from the Applicant how this situation might be addressed.

2. Impact on Landscape

The revised Volume III of the Environmental Assessment does not appear to contain any consideration of a view from Coploe Hill in Ickleton Parish, as pointed out by Hinxtton Parish Council in spring 2019. Hinxtton PC in their submission dated 13 September correctly highlight the considerable visual impact the Campus Expansion will have on the land between the Existing Campus and the A11, and refer to SCDC's own landscape consultant concluding that mitigation of the impact of the Expanded Campus from surrounding higher viewpoints is not possible.

We have always maintained that the impact of the proposals remains massive. Whereas the Existing Campus may be viewed as a prominent feature in the landscape, the Expansion site would, if permitted in its present form, become the dominant feature in the Cam Valley as viewed from Coploe Hill. The proposals simply fill out the valley floor.

The risk of cumulative impact from these proposals and the impact of the North Uttlesford Garden Community embedded in the UDC Local Plan just across the A11, to say nothing of another major development proposal on land adjoining the Campus Expansion Site is not considered in the Application. Cumulative impact risk should be given full consideration as a matter of urgency.

All of our previously expressed objections to this Application are maintained – lack of engagement with Local Planning, inadequate traffic and transport assessments and mitigation measures, a development that is too large for its site and too urban in nature, which does little or nothing for neighbouring communities, which sacrifices valuable agricultural land and will consume finite water resources in an increasingly arid area. Sustainable expansion of genome-related research with limited commercialisation has been jettisoned in favour of housing and large-scale commercialisation that could be perfectly well catered for in existing Science Parks. We urge refusal of the proposals.

Linton Parish Council

Original Comment

Objects: Although the scientific, biomedical and economic benefits that would be brought about are welcomed, the PC has concerns that the regional context in relation to transport infrastructure has not been fully considered, particularly the impact on areas to the east and north, despite being included in the A505 Study Area. The cumulative effect of this development, along with AgriTech and NUGC would further contribute to congestion and traffic problems.

Amendment Comments (April amends)

Objects: Maintains concerns regarding transport and traffic and cumulative impact with AgriTech and NUGC.

Amendments Comments (Aug amends)

Objects: Maintains traffic and transport objections, the transport implications to the north and east have not been considered.

Little Abington Parish Council

Objects: Little Abington Parish Council (LAPC) recognises the excellent and life-changing research carried out at the Genome campus and recognises the need for expansion to maintain its international lead. However, it is alarmed at the scale of these proposals, which can only add to the existing congestion in the area; in particular, the A505 is already extremely busy at peak times. This is likely to be exacerbated by several other planned developments nearby.

The PC is aware that Hinxton Parish Council has made extensive detailed comments and support their stance on this. LAPC objects to the application. Points that are of particular concern include:

Planning

The recently adopted (2018) South Cambs Local Plan has not designated the area to the east of the A1301, which is good quality agricultural land, for housing or employment. Expansion of local businesses is allowed only if the scale is appropriate and there is no adverse effect on the countryside. The scale of the proposed development will dwarf the local villages, both in number of dwellings and height of both residential and especially the industrial buildings. The density of this development is much greater than the existing campus and seems more appropriate to an urban location. The PC are very concerned about the effect on both the landscape and environment, including the chalk aquifer.

Housing

This application, with its large new housing content, and industrial scale buildings, seems totally incompatible with the Greater Cambridge Housing Strategy. The number and height of these buildings are both unacceptable.

Transport

A development of this scale needs to be properly planned in the local plan, along with the necessary infrastructure, notably roads. The PC feel that the measures proposed at the McDonalds roundabout are far from adequate and are not convinced that the traffic-calming proposals for the A1301 are ideal for a busy route from the M11 to Sawston area. The PC are of course particularly concerned about the knock-on effect on the local roads, especially the A1307 and A11, in addition to the A505. This aspect needs a coordinated approach to the various proposals, including this one, which would best be handled by a revised local plan. A possible solution might include an upgrade to junction 9 of the M11, which could also be used to handle traffic from Saffron Walden and perhaps even Haverhill.

Conclusion

The planning application seems to breach the new Local Plan in very many ways, as detailed by Hinxton Parish Council. Little Abington Parish Council objects to it and urges the District Council to ask the Wellcome Trust to withdraw and reconsider it in the light of these comments.

Amendment Comments (April Amends)

Objection Maintained: Whilst the PC welcome recent attempts to engage with local parish councils Little Abington Parish Council continues to object to proposals to develop the Wellcome Genome Campus at Hinxton and to support Hinxton Parish Council and other parish councils in the immediate vicinity that have voiced their concerns. Despite the amendments to the scale of the proposed development it will still impact on the local villages and the environment, both in the number of dwellings and the appearance of the buildings. The density of this development is not appropriate in a rural location. Previous objections are raised again and have not been overcome.

Amendment Comments (Aug Amends)

LAPC believes that a development of this scale needs to be properly planned in a local plan, along with the necessary infrastructure, notably roads. A true local plan should not only be about housing. We feel that the measures, including the updates, proposed are far from adequate and we remain unconvinced that the proposals for the A1301 will be effective.

The Local Plan did not designate the area to the east of the A1301, which is good quality agricultural land, for development. Expansion of local businesses is allowed only if the scale is appropriate and there is no adverse effect on the countryside. Despite the amendments to the scale of the proposed development, it will still impact on the local villages and the environment, both in the number of dwellings and the appearance of the buildings. The density of this development is not appropriate in a rural location.

Local roads

The scale of these proposals will add to the existing transport congestion in the area. In particular, the A505 is already extremely busy, with traffic queueing on to the M11 at junction 10 in the morning rush hour.

The A1301/A505 junction is already very congested at peak times and more congestion will lead to more rat-running around their villages and indeed further afield.

Local authorities and the multitude of tiers of local government must work in collaboration to develop a coordinated approach to the various proposals for development in this area, including this one. If they agree that their strategy is to support significant development then serious consideration must be given to investing in and upgrading junction 9 of the M11. This will enable improvement of the management of traffic flows to and from Saffron Walden/North Uttlesford and Haverhill.

This is likely to be exacerbated by several other planned developments nearby including Agritech, proposals for developments in Sawston and Duxford and the recently publicised proposal for a MedTech development on the Comfort Café site in Little Abington. In addition, we understand that Granta Park and the Babraham Research Campus expect to attract many more employees in the near future.

Over-development

There is a risk of over development in a rural area. There are other sites in the area with the scope for accommodating a wide range of biomedical research and development. Overprovision could lead to under occupation and the potential for sites to lie derelict.

The apparent lack of strategic oversight of the various proposals for developing this rural area of south Cambridgeshire and the consequent impact on infrastructure and environment by the local planning authority i.e. SCDC is a concern. Consideration must also be given to the proposed large housing development in North Uttlesford, an ideal location for the people who will work on these new sites, which will also add to congestion.

Residential development

We agree with Ed Harris of Duxford Parish Council that the high number of accommodation units is not justified. As he points out, the long-term accommodation will generate as much traffic as you are trying to save by dint of the partners and children needing to get from their house to their place of work or school.

We also doubt whether many young people coming to work on the site would actually wish to live in the residential accommodation offered. The experience of a few of our parish councillors who work for biotech companies in the area is that young members of staff prefer to live in Cambridge with its restaurants, entertainment and cultural and sports opportunities. Furthermore, young recruits don't generally stay for more than a few years with a company and therefore won't be seeking long-term accommodation.

Conclusion

We recognise the excellent and life-changing research carried out at the Genome campus and the need for expansion to maintain its international lead in the areas of research for which it is already recognised.

We also recognise that Wellcome seems to be a good employer and neighbour and does good 'outreach' work, with access to their campus. So we would be happy to see some expansion but the proposed scale, even over many years, seems excessive.

Little Chesterford Parish Council

Objects: Little Chesterford Parish Council has always supported the development of research employment opportunities in the surrounding area, provided that appropriate measures are taken to mitigate any adverse impact on the surrounding

area. The PC are therefore supportive of the expansion of the Welcome Genome Campus to continue to carry out world class research. However, the PC do have some serious concerns with the above proposal as it stands.

The impact of traffic on the A1307 and surrounding roads appears to have been underestimated. The traffic analysis appears to use a single atypical day on which to base projections. Neither does the analysis take any account of traffic arising from future development in North Uttlesford.

A settlement of 5000 houses (the “North Uttlesford Garden Community” or NUGC) forms part of the Uttlesford Local Plan that has been submitted to the planning inspector in January 2019. The site of the NUGC is immediately adjacent to and shares a boundary with the proposed development, and traffic from this site will use all the same transport connections. Notwithstanding the development of this particular site, the A1307 forms the access to the M11 northbound and to Cambridge for almost all traffic in the north of Uttlesford, including the major town of Saffron Walden. The alternative access to the M11 Northbound that does not use the A1307 (or associated rat-runs through villages) is 18 miles to the south. Similarly, the development of Chesterford Research Park is proposed to double in Uttlesford Local plan, and those working at this site will also use the same transport links as the proposed development.

The proposed traffic mitigation measures appear to be inadequate to cope with increased traffic, appearing as they do to consist of widening of roundabouts and traffic lights. They do not take account of the bottlenecks that are already evident to anyone using the A505 as it narrows to one lane between the A1307 and M11 at any time of the day, not just peak periods. Nor do they address the issue of rat running through adjacent villages, such as Ickleton.

The proposed traffic calming measures on the A1307 at Hinxton seem inappropriate for such a key route taking traffic from north Uttlesford to the M11 and Cambridge. Such measures would seem only to increase congestion at the A1307/A11 junction and A1307/M11 junctions immediately to the south of the campus. Additionally they would appear to be more suited to significant conurbations than the rural landscape of which the campus is a part.

The nature of the proposed buildings are out of character with the surrounding area. Residential units in existing settlements are single/double storey, not the multi-storey flats proposed. These and the multi-storey commercial buildings will have a high visual impact. Unlike the current Genome Campus or Chesterford Research Park nearby, they are not screened from transport routes or viewpoints from the surrounding rural landscape.

Pampisford Parish Council

Objects: This large development is not in the current South Cambridgeshire Local Plan and would be situated on good quality agricultural land.

The greatest concerns for Pampisford residents are the impacts this proposed development will have on traffic movements in the local area. As a small village

aligned along the A505 it is particularly affected by the increase in traffic along the A505 and its intersection with the A1301 [Macdonald's roundabout]. It is important that major funding is included in the development plans to improve the flow of traffic on these roads.

However enlarging the A505/A1301 roundabout and adding traffic lights will not improve the flow of traffic, because the roads, particularly the A505 between the roundabout and the M11 are already at full capacity for much of the day. So easing the flow on the roundabout is a waste of resources, if the vehicles have nowhere to go! A knock-on effect will be an increase in vehicles rat-running through Pampisford, in order to avoid the roundabout altogether. By the same token, slowing the traffic on the A1301, at Hinxton will cause increased rat-running through Ickleton and Duxford as Saffron Walden traffic wanting to go north aims for Junction 10 of the M11. Traffic will therefore increase on all local rural roads.

Dualling the A505 is not possible along its length from Pampisford to M11 as there are now too many buildings close by. This large development should not go forward, without the necessary alterations being made to Junction 9 of the M11, so allowing access from the north as well as from the south.

The plans for improving the cycle paths and possibly providing a track across the fields to Whittlesford Parkway station are to be commended but many employees will need to drive. This is acknowledged in the plan which appears include provision for up to 2,000 car parking spaces.

The size of this development is too large and many of the buildings are too tall for the site and even the growth of trees, which will be slow, will not entirely hide them. Uprooting a belt of established mature trees, is also a retrograde step for biodiversity.

There will be strains on local infrastructure including water, sewerage and power supplies. Some services, such as a primary school and a medical centre will need to be available before the accommodation is constructed, not after it, in order to prevent a detrimental effect on existing local facilities.

There must be a guarantee that all the accommodation remains within the control of the Wellcome Trust Genome Camp, Hinxton, for their employees and none should be sold.

Much is made of the important role the Hinxton site has in genome research. This is an already known fact so international scientists will be happy to come to work at the existing facilities.

There is already expansion taking place on nearby research campuses where the commercial companies would be equally comfortable.

The cumulative impact of all the developments in this part of South Cambridgeshire, including those already operating, those planned and those envisaged in the future need to be considered as a whole in considering the total effect on all local communities.

Sawston Parish Council

Original Comments

Supports: The application is supported in principle but a number of concerns are raised including: infrastructure, transport, housing (more detail required), secondary education (more detail required).

Amendment Comments (to April amends)

Supports: The previous comments are re-iterated. The proposal should take into account Uttlesford DC LP.

Amendment Comments (to Aug amends)

Sawston Parish Council supports the application in principle but considers that before permission is granted, the following issues need to be addressed. Employment and car usage figures provided by the applicant suggest that, even allowing for 1,500 of the new employees being accommodated on site, the numbers of employees accessing the site by car would increase by around 113%*.

The cumulative impact of all development on traffic volumes on the A1301/A505 (McDonalds) Junction needs to be taken into account, especially the already permitted re-development of the Unity Campus (formerly Sawston Trading Park) London Rd, Pampisford which includes provision for 703 parking spaces (Applications S/2284/17/OL & S/1651/18/RM). Consideration should also be given to the potential traffic impact of the 5,000 dwelling new settlement on an adjacent site at Gt. Chesterford (North Uttlesford Garden Community, NUGC) proposed in the submitted Uttlesford Local Plan.

Sawston Parish Council notes the proposal for a light controlled pedestrian/cycle crossing on the western arm of the A1301/A505 roundabout and the proposed modifications to this junction. The Council is concerned that introduction of a light controlled crossing in this location would increase the already serious queuing of eastbound traffic on the A505 at peak times, which also leads to tailbacks on the M11 south facing slip road at Junction 10. It recommends that safety issues at this junction should be dealt with by a bridge or underpass conversion of A1301 through the site to a 'multi modal urban street' with 30 mph limit (Design & Access Statement Ch4, p.72) is likely to increase congestion for through traffic and unless M11 Jn.9 is upgraded to all movements, will probably create the need for a bypass at a future date. The Council notes that, on the applicant's figures, the residential development is likely to generate 95-100 secondary school pupils and that the nearest provision is at Sawston Village College. In order to encourage cycling, the Council requests that an S106 contribution towards the construction of a cycleway along A1301 between the A505 & the junction of the A1303 and Mill Lane, Sawston, is obtained.

Finally, the Council regrets that a number of major developments are coming forward which will cumulatively have very significant effects on the character of this section of South Cambridgeshire, converting it from a predominantly rural to a more urban environment. For example, should NUGC come forward, it is doubtful whether the proposed housing on the adjacent Wellcome site would be needed. It is unfortunate that there appears to be no appetite for addressing these issues holistically through a cross border AAP or DPD with Uttlesford, using as a model the long established and highly successful cross border planning arrangements between South Cambridgeshire and Cambridge City.

* Calculated as follows:

Existing employees: 2500

New employees: 4330

(Planning Statement, p.89 Para 6.19)

Estimated 'just over half' journeys by car – current data – Planning Statement Para 7.55)

So: Approximate existing number of car journeys:

$2500 \times 50\% = 1250 \times 2 = 2500$ (morning plus evening journeys)

New employees; 4330, of which ~ 1500 living on site; $4330 - 1500 = 2830$

$2830 \times 50\% = 1915 \times 2 = 2830$

Increase in car movements of 113%

Stapleford Parish Council

Objects: Stapleford Parish Council fully endorses the submissions from Hinxton Parish Council and Great Shelford Parish Council. This large development is not in the current South Cambridgeshire Local Plan and Stapleford Parish Council objects to this planning application Comments from Stapleford Parish Council are as follows:

-the traffic implications of so large an expansion are severe and the WGC mitigation proposals wholly inadequate. The traffic through Stapleford is likely to increase significantly. It is important that funding is included in the development plans to improve the flow of traffic on surrounding roads, particularly the A1301 and A505.

-the scale of the expansion is excessive because it is not necessary for commercial companies using WGC analyses to be housed on the same site.

-it is unlikely that there will be an appetite for so much housing on site in a scientific ghetto of tied cottages. Although opposing views were expressed the majority of Stapleford Parish Councillors consider the housing proposals excessive. In addition it is naïve to advocate tied housing in a free economy where the ability to sell one's house to anyone without restriction is embedded into the long term principles and process.

-it should be a condition of the application to take into account all the other schemes/developments in this part of South Cambridgeshire and as a minimum the dualling of the A505 and a flyover at the MacDonalds roundabout intersection. Planned development at Whittlesford Parkway station does not take extra growth into account; the proposed multi-storey car park will only provide a modest increase

in car parking. Improved facilities for bus turning and bus shelters should also be included.

-the plans for improving the cycle paths and providing a track across the fields to Whittlesford Parkway station are to be commended. Additional cycle paths should also be considered from surrounding villages including Stapleford as not all staff will live on site.

-traffic, schooling, health and other infrastructure should be in place in advance of any development.

-the PC strongly support the concerns expressed by Hinxton Parish Council in relation to flood and water management i.e.

Thriplow Parish Council

Objects: Due to the scale of the proposed development and its impact upon the environment. There are major concerns about the impact of the development upon surrounding roads especially the A505 which is already subject to heavy traffic.

Whittlesford Parish Council

Objects: On the following grounds:

In the recently published South Cambridgeshire Local Plan of 2018 which covers the period to 2031 there is no provision of land within Hinxton for additional large scale housing development. In fact there is sufficient land available elsewhere in South Cambridgeshire to meet the perceived requirements for new housing until at least 2023. By 2031 a total of over 23,000 new dwellings have been proposed in the Local Plan for the major development areas of Northstowe, Waterbeach, New Town, Bourn Airfield and Cambourne West. In addition, a further 540 homes are scheduled in nearby Sawston.

Although the Whittlesford Parish Council is sympathetic to the needs of the Wellcome Trust to expand their research facilities on the Genome Campus the proposal to create a further 4,200 new jobs on site vastly exceeds what would be acceptable to the local communities including Whittlesford.

Developments on this scale in a small village such as Hinxton, which is classified by South Cambridgeshire District Council as an 'in-fill' village, would not only completely overwhelm the present very attractive village and its limited infrastructure but also would have severe deleterious effects on the neighbouring villages particularly through 'rat-running' and the additional car journeys on the already heavily congested A1301 and the A505 roads. It should also be mentioned that the extra car traffic from the proposed Rural Travel Hub at Whittlesford Parkway Station (A505) has not been mentioned in the Application.

The proposal to develop large tracts of good quality agricultural land for housing, shops, bars, restaurants, and hotel is in complete disregard of Policy NH/3 of the above Local Plan.

The proposal to build 1,500 new houses without any 'affordable element' speaks of sheer greed. The proposal is in direct contradiction of Policy H/10 of the Local Plan which requires 40% of all new builds of 11 or more units to be 'affordable'. The suggestion that all these new units will be needed for the increased workforce does not hold water when they are to be let at 'open market' rates. Past and present experience has shown that professional workers opt for buying the properties they live in, and lower paid domestic workers would not be able to afford the 'open market' rents. Then there would be pressure from the Wellcome Trust to be allowed to sell all surplus units at 'open market' values.

The building of 1,500 new houses mainly occupied by young people (Wellcome's statement) would necessitate the building of a 2-form entry primary school in the Hinxtton area. No specific site has been allocated and concrete proposals for funding are also lacking. Secondary education of children from the age of 11 has been virtually ignored. Sawston Village College (Hinxtton is part of the catchment area) is already struggling to cope with the ever-increasing demand for places.

Medical facilities for this area are based in Sawston and are experiencing difficulty in meeting demands. A further 2,000+ dwellings including those already sanctioned for Sawston would exacerbate the problem.

Whittlesford Parish Council requests that the South Cambridgeshire District Council ask the Secretary of State for Housing, Communities and Local Government to 'call in' this Application so that it might be examined in the wider context of the area, together with the proposals for 5,500 new houses in the proposed North Uttlesford Garden Village (already 'called in'), and the AgriTech proposals (4,100 new jobs) which are currently subject to Appeal. Any one of these proposed developments would have far reaching consequences for the local area if there were not appropriate measures taken to upgrade the local infrastructure, particularly the road and public transport network, and the various utilities prior to any large-scale development taking place. Any such enquiry should also look at the possibilities and benefits of improving Junction 9 of the M11 motorway to provide full interchange facilities.

The proposal resurrects a long gone medieval feudalistic scenario – 'tied cottages'. In the 21st century workers would not wish to be compulsorily turned out of their homes should they decide to leave Wellcome's employment. In effect the Proposal discourages the free movement of labour.