

From: William Brown, Chair, Hinxton Parish Council

To: Stephen Kelly, Joint Director for Planning and Economic Development for Cambridge and South Cambridgeshire

3 July 2018

Dear Mr Kelly,

Planning Application S/2209/18/E2, Wellcome Genome Campus

1. In response to your invitation of 16 June 2018, Hinxton Parish Council takes this opportunity to comment on the criteria and issues that the Wellcome Trust proposes to consider in scoping the environmental impact of its proposed development of the Wellcome Genome Campus. Here we raise issues which we consider their EIA Scoping Report fails to cover or deals with inadequately. We request that South Cambridgeshire District Council require that these deficiencies be remedied.
2. **The impact of the proposed development on Hinxton cannot be overstated.** The Wellcome Trust proposes to expand our village tenfold in ten years. Having evolved as a stable community of under 150 dwellings for over a thousand years, it is proposed that Hinxton should have up to 1500 dwellings and extensive further industrial buildings added to it by 2028. Your remit to us in your invitation is not, at this stage, to question the necessity or desirability of this traumatic shock, should it be taken further by SCDC; it is with the issues and measures that should be considered with a view to its mitigation.
3. **Governance issues.** In effect, it is being proposed to turn Hinxton into a company town. Our village would become a small part of a much larger community (larger than Hinxton, Ickleton and Duxford combined), which would be largely controlled by the Wellcome Trust. Past experience of planned company towns such as Cadbury's Bournville or Unilever's Port Sunlight is that they can become successful communities. But it raises important issues of governance and local representation that are wholly ignored in Section 13 (Socio-Economics) of the Report. Hinxton Parish Council has generally found the Wellcome Genome Campus and Trust to be a good neighbour and land-owner, with a routine habit of constructive consultation on parish issues and on the management of its Wetlands reserve. But the massive scale of the proposed expansion is such that more robust and formal procedures are required. **The Scoping Report should specify formal procedures to involve existing residents of Hinxton in decisions on any proposed expansion of their village and in its future governance.**
4. **Residents' rights.** The scale of the expansion raises new issues for the rights of the existing village community to have access to facilities provided for the new residents. It will greatly increase stress on a wide range of village amenities such as its playground, pub, footpaths, roads and its rural seclusion. It will be important for the Trust to ensure that existing amenities are not degraded, but are protected and enhanced. The village community currently takes considerable pride in the Genome Campus's research achievement and charitable work, and it makes the many visitors to the Campus from around the world feel welcome. It will be important to build on this inclusiveness if the number of residents increases. It is accepted that a high level of privacy and security will continue to be necessary for scientific and other working buildings. But it will be important to avoid any unnecessary separation of rights of the new residential community from the established one, which it would rapidly dwarf. A substantial proportion of the new community will from the outset be partners and family not employed by the Trust and its affiliates. The residents of the existing village should be granted full and equal access to all health, educational, retail, transport, recreational, broadband, sports, playground, and crèche facilities offered to the residents of the new development. Where appropriate there should be similar extensions to residents of immediately neighbouring parishes. **The Scoping Report should make a clear commitment to grant to all Hinxton residents full and equal rights of access to all the facilities made available to new residents of the Genome Campus development.**

5. **Residency constraints.** The social and environmental impact of the proposed ‘up to 1500 new residential dwellings’ on the village will be strongly influenced by the cost and ownership constraints placed on them. At heart is local concern about the extent to which the purpose of the housing is to provide long-term support for on-site employment, as opposed to raising capital for the Trust. Critical issues in need of clarification include: i) the proportion of rental accommodation; ii) the affordability of accommodation to people on average and lower incomes; iii) how far the Wellcome Trust will retain freehold ownership of any housing that is sold; iv) whether housing sales will include arrangements for sharing value gain when they are resold; v) whether the prioritisation of applications for the housing will include a category for local people who have no links to the Trust or its ancillary research organisations. **The Scoping Report should indicate the extent, character and prioritisation of rental and sales arrangements for the dwellings.**
6. **Traffic effects.** Hinxton residents are already severely constrained by traffic obstructions at peak periods on the A1301, where it meets the A505, and on the junctions of the A505 with the M11 and the A11. The scale of the proposed development would massively increase these problems, for which the mitigation measures so far suggested would be wholly inadequate. Without accurate assessment and appropriately scaled mitigation measures, the proposed Genome Campus expansion, with its additional junctions on the A1301, could have crippling implications for the village. It has been a feature of some recent planning applications in this area (e.g. SmithsonHill Agritech park, North Uttlesford Garden Community) that the reports of traffic consultants have been grossly inadequate to the extent of being deliberately misleading (see Hinxton PC’s comments on S/4099/17/OL). It is important that the SCDC traffic engineers treat any consultancy-provided surveys funded by the applicant with extreme scepticism. **The Scoping Report should provide for sampled independent audits of all data and analyses of traffic effects funded by the applicants.**
7. **Landscape impact.** The scenery of the upper Cam valley is blind to county boundaries and is shared by Cambridgeshire, Essex and Hertfordshire. The Scoping Report specifies a radius of viewpoints of 3km (para 4.16). This is insufficient. The character of the countryside is intermittent clusters of buildings (villages, farms, science parks etc) and woods, set in farmland across a broad area, framed by rolling chalk hills. The selection of viewpoints should take account of these broad views by including high points (e.g. Coploe Hill (map ref 495421), Park Farm hill (520455), the Grange Little Abington (532504), Hanley Hill Pampisford (495478), Stud Farm Whittlesford (470475), Crishall Grange (460435)). **The Scoping Report should include viewpoints of up to 7km distance on high ground to evaluate landscape impact.**
8. **Aquifer recharge.** The Scoping Report makes clear the extreme water stress in South Cambridgeshire and the importance of ensuring full aquifer recharge in this Groundwater Protection Zone 2 area. Recent public comments by some water companies suggest that they may not have sufficient long-term interest in aquifer protection for residents’ needs. **The Scoping Report should place emphasis on the evaluation of adequate aquifer protection by the Environment Agency rather than by the water providing companies.**
9. **Flood risk.** The Scoping Report provides an unduly localised view of the change in flood risk arising from this development and of the role that the Wellcome Trust can play in mitigating it. Because the Trust owns the River Cam and its flood meadows for 3km downstream, it is in a position to improve utilisation of the flood meadows which would have benefits as far downstream as Cambridge. Hinxton Parish Council, supported by Cambridge Past Present and Future, and by the Cambridge Trout Club, has proposed to the Trust that the placing of a static compound side-weir just upstream from Hinxton Mill would alleviate a water bottleneck, solve problems with sluice management, and improve the water retention of the water meadows. **The Scoping Report should include proactive measures open to the Wellcome Trust to**

alleviate existing and future flood risks by more efficient use of its flood meadows in the Cam valley.

10. **North Uttlesford Garden Community**. A far bigger threat to Hinxton, and a major constraint to the proposed Genome Campus development, is posed by the new town currently included in Uttlesford's Draft Local Plan (4.17). More than half the boundary of the proposed new town is the Cambridgeshire county boundary; the proposed new town boundary accounts for more than a third of the boundary of the proposed Genome Campus development site, along Hinxton's south-east boundary. It would be a major failure of the political process if the decision on this new town were to be left to Uttlesford District Council, which would not have to bear the bulk of the massive consequent costs. **The Scoping Report should include and make clear the scale of the potential impact arising from the proposed North Uttlesford Garden Community.**

11. **Cumulative effects**. Other relevant local proposals include the SmithsonHill Agritech business park (refused but open to appeal), the Sawston Trade Park, the Granta Park extension, and potential expansion of Chesterford Research Park. It is important that the impact of all these on traffic, landscape, aquifers, flooding, sewage disposal, electricity supply, and social infrastructure such as schools and surgeries is considered. **The Scoping Report should evaluate the combined effects of all prospective developments in the upper Cam valley that would interact with the present application.**

Yours, on behalf of Hinxton Parish Council,

William Brown (Chair)