

Hinxton Parish Council's comments to South Cambridgeshire District Council on the amendment (April 2019) to the outline planning permission for Wellcome Genome Campus at Hinxton

1. These comments relate solely to the amendments and further information submitted by the Wellcome Trust in April 2019 to their outline planning permission application (S/4329/18/OL). In our comments of 31 January 2019 on that outline application we expressed serious objections. We demonstrated that:
 - i. The application does not comply with the SCDC's Local Plan adopted in 2018
 - ii. The traffic and transport analysis is flawed and the mitigation measures are inadequate
 - iii. The impact on the landscape and environment would be substantial and damaging
 - iv. The change of function of the Campus embodied in the application is inappropriate
 - v. The proposed housing numbers are inappropriate
 - vi. The proposals fail to meet community needs or to engage with the local community

2. **We take those earlier objections as read.** Our purpose here is to reaffirm them and to indicate why the amendments to the application and the additional information provided in the Addendum Report fail to modify our objections. In summary, the amendments relate to:
 - a. Reduction in proposed maximum building heights in certain parts of the plan (A1, A2, and A4)
 - b. Minor changes to the proposed roundabouts and highway of the A1301 within the Expansion Land (A3)
 - c. An additional access point for pedestrians and cyclists (A5)
 - d. Redesignation of land from agricultural use to playing fields (A6)

3. **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'.**

4. **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 our earlier evidenced conclusions that:
 - a. The assumptions about traffic generation by the development are unrealistic.
 - b. The proposed traffic mitigation measures away from the Campus on the A505 are inadequately modelled.
 - c. The traffic modelling is blind to long-distance traffic passing through on the A1301

- d. The traffic modelling effectively ignores the impact on local by-roads through villages.
- e. 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.’

5. **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.

6. **Effect of redesignating land previously set aside for agriculture for use as playing fields (A6).** The proposed redesignation 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. We 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 we indicated before. It is proposed to replace 113ha of dwellingless 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 we 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 Hinxton Parish Council’s material objections to the application. We 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 our local community.

William Brown
Chair and on behalf of Hinxton Parish Council
16 May 2019