# <u>Hinxton Parish Council's objections to South Cambridgeshire District Council on</u> <u>Wellcome Trust Genome Campus application S/4329/18/OL</u>

Hinxton Parish Council wishes to place on record its 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 25 years ago. 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. We have, 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. We argue that the proposal as it stands would severely damage the economic and everyday life of Hinxton village.

Our 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

# 1) 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 Local Plan is clear that within this EEA '...appropriate development and redevelopment will be permitted...' (8.56). We fully accept that. This is not, however, the case for the 113.05 ha of agricultural land to the east of the A1301 and outside the EEA, described in the application as the 'Expansion Land'. This is where the great majority of this development is proposed. Even within an EEA, Policy E/15:3 states that 'Permission will be refused where there would be a negative impact on surrounding countryside, or landscape character.'

The proposed development contravenes the 2018 Local Plan's specific designation of Hinxton as an 'Infill Village' (S/11). For such villages the Plan specifies that 'Residential development and redevelopment within the development frameworks of these villages ...will be restricted to scheme sizes of not more than 2 dwellings. ... In very exceptional circumstances a slightly larger development (not more than about 8 dwellings) may be permitted where this would lead to the sustainable recycling of a brownfield site bringing positive overall benefit to the village' (S/11:2,3). The Plan adds that: 'Development on any scale would be unsustainable in these villages, as it will generate a disproportionate number of additional journeys outside the village' (2.63).

The proposed development is contrary to the requirements that the 2018 Local Plan places on 'New Employment Development in Villages', on 'New Employment Development on the Edges of Villages', and on 'Expansion of Existing Businesses in the Countryside'.

Policy E/12 on 'New Employment Development in Villages' states that 'Within development frameworks in villages, planning permission will be granted for new employment development (B1, B2 and B8 uses) or expansion of existing premises provided that the scale of development would be in keeping with the category and scale of the village, and be in character and scale with the location.'

Policy E/13 on 'New Employment Development on the Edges of Villages' states that employment development permitted on sites adjoining or very close to the development frameworks of villages will be permitted where: '(e) The proposal is logically related to the built form of settlement, the scale and form of the development would be in keeping with the category and scale of the village. (f) The

proposal would not have an unacceptable adverse impact on the character and appearance of the area and in particular the village edge, and is in scale with the location.'

Policy E/16 states of 'Expansion of Existing Businesses in the Countryside' that expansion will be permitted where: '(c) The proposal is of a scale appropriate in this location, adjacent to existing premises and appropriate to the existing development. (d) There is no unacceptable adverse impact on the countryside with regard to scale, character and appearance of new buildings and/or changes of use of land. ... (f) The proposed development would not (by itself or cumulatively) have a significant adverse impact in terms of the amount or nature of traffic generated.'

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 2018 SCDC Local Plan

#### 2) Traffic and transport

The 2018 Local Plan Policy T1/2 states that: '3. Developers will be required to demonstrate they will make adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal... This will be achieved through direct improvements and Section 106 contributions ... to address transport infrastructure in the wider area including across the district boundary.' '4. Developers of 'larger developments' [>20 dwellings] or where the proposal is likely to have 'significant transport implications' [e.g. 'where there are particular local travel problems'] will be required to demonstrate that they have maximized opportunities for sustainable travel and will make adequate provision to mitigate the likely impacts through provision of a Transport Assessment and Travel Plan'. Policy E/16 on Expansion of Existing Businesses in the Countryside requires that expansion will be permitted where ... 'The proposed development would not (by itself or cumulatively) have a significant adverse impact in terms of the amount or nature of traffic generated.'

Extreme traffic congestion is Hinxton'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 has become so great a problem that as the Parish Council we have twice recently carried out surveys of traffic queue time and queue length, enlisting the everyday experience of them by villagers. The first was conducted last winter and it has been repeated in the last month. The results are displayed in the Appendix to these comments. We make no claims to statistical precision, but 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 that are often in excess of 60 cars and queue times often in excess of 15 minutes. Similarly, 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. The one conducted in March 2017 by MayerBrown for the Sawston Trade Park planning application (S/2284/17/OL)¹ reported: 'It is concluded that both the A505/A1301 roundabout ['McDonalds'] and the M11/A505 roundabout are currently over capacity in both the morning and evening peak periods ...the junctions assessed are currently operating at capacity.' (1.18, 1.19, p378). Two years earlier the transport assessment conducted by Granville Consultants for expansion of Granta Park² (S/1110/15/OL) had found of the A505/A1301['McDonalds'] roundabout that 'This junction operates over capacity in the 2015 base year' (7.8) and looking forward stated that 'For 2017 and 2032 . . . the junction capacity issues will worsen ...'. Our village's everyday experience, reflected in our surveys, is that this deterioration has indeed continued. For the majority of Hinxton households, who have members who commute to work in Cambridge or London and elsewhere, it is a severe problem and is a growing source of damage to the economic and everyday life of the village.

The McDonalds roundabout, and the 2km stretch of the A1301 to the south, are of crucial importance for access to and hence the success of the Genome Campus and its proposed development, as well as to Hinxton village. Despite this importance and despite the evidence of current over-loading from previous studies, however, 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' (Transport Assessment 12.1; 10.20 et seq.)

There are a number of aspects of the Vectos traffic analysis and modelling that are unconvincing. We draw the attention of the SCDC and CCC traffic engineers to the following:

- Assumptions about traffic generated by the development appear to be unrealistic. For example, data in tables 12.22, 7.22, 7.23, 7.24, and 12.25 (in App 12.1) imply improbable assumptions. The combination of 4500 more employees, the employee families of many of 1500 new homes, delivery vehicles, school trips, realistic modal split and vehicle occupancy rates etc. is likely to imply substantially more additional vehicles at peak on A1301 north than the 350-500 range suggested. Similar criticisms can be made of assumptions for Campusgenerated traffic in Table 6.1 (App 12.1). There is, for example, no basis for the optimistic assumption that single-occupancy of vehicles will fall to 40%, especially on an expanded site with more diverse employers.
- Proposed traffic mitigation measures away from the Campus are inadequately modelled. The main measures proposed are traffic-lighting and widening at two roundabouts Junction 10 on the M11/A505 and at the McDonalds roundabout at the junction of A505 and A1301. The modelling appears to ignore the fact that a major impediment to traffic flow on the A505 is its narrowing to single lanes in the less than 3km between those two roundabouts (close to Whittlesford Parkway). This current (but overlooked) bottleneck would also have adverse interaction effects with the proposed traffic-lighting of the two roundabouts.
- The modelling appears to be blind to long-distance traffic passing through. The A1301 and its continuation as the B184 (Walden Road) constitute the major travel route between Cambridge (and also for traffic coming south down the M11) and Saffron Walden. The proposed traffic calming on the A1301as it passes through an expanded Genome Campus would have severe consequences for long-distance traffic. Similarly, the proposed addition of traffic-lights on two roundabouts on the A505 would seriously impede traffic on what is a major east/west route for the region. Traffic and congestion on both through routes can be expected to continue to increase as the local economy expands.
- The traffic modelling appears to ignore local by-roads. The by-roads immediately leading to the north and west of the A1301 through Ickleton, Hinxton and Duxford are currently used as

<sup>&</sup>lt;sup>1</sup> MayerBrown/Shrimplin|Brown, Further response to Cambridgeshire County Council, 11 October 2017

<sup>&</sup>lt;sup>2</sup> Glanville, Transport Assessment, Phase 2 Land, Granta Park, 30 April 2015

'rat-runs' to avoid congestion on the A505 and A1301. They are likely to come under further pressure with the development. These do not appear in the modelling of mitigation of 'the effect of development on the local highway network' (App 12.1: 9.1 *et seq.*), but the weight of traffic on them is fundamental to the safety and life of our villages.

- The validity of some traffic survey data is unclear. For example, the Manual Classified Counts and Queue Length surveys conducted by Vectos were carried out on 27 February 2018 (App 12.1: 2.85). That was one the days of severe weather known as 'the Beast from the East' causing exceptional road and rail traffic disruption and school closures locally <a href="https://www.metoffice.gov.uk/climate/uk/interesting/february2018-snow">https://www.metoffice.gov.uk/climate/uk/interesting/february2018-snow</a>). Although it is reported that further surveys were conducted on another single day, 19 June 2018 (App 12.1: 2.90), it is unclear how representative the data used might be. Some data presented in the traffic analysis are clearly invalid: Tables 12.15 (2018 AM peaks) and 12.16 (2018 PM peaks) are identical and cannot both be correct.
- A large number of unsupported assertions are made on key issues. For example:
  - o 12.6.25 '... suggest improvement in journey times'
  - o 12.6.29 '...it is considered that the traffic impacts are acceptable'
  - o 12.6.31 '... the effect of the Proposed Development flows will be mitigated'
  - o 9.50 '... it would be possible to adjust signal timings ... to ensure the queue does not reach the end of the slip road'
  - 9.59 'The introduction of traffic from the Proposed Development and the proposed improvements to the McDonalds Roundabout and Junction 10 of the M11 has an overall positive benefit to journey times within the area, particularly along the A505.'

In our formal response of 3 July 2018 to the Scoping Report we requested 'sampled independent audits of all data and analyses of traffic effects funded by the applicants'. We repeat that request.

#### **Public transport**

At earlier stages of Wellcome's consultation with Hinxton on their plans they suggested that they 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. We are left with no more than the possibility of using their present shuttle bus on the public highway between the station and the village. This would be for a greatly increased employee and community population and would further exacerbate congestion and worsen journey time on the A1301 and A505. The application's mitigation proposals for public transport are worse than inadequate.

On the evidence provided, 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.'

## 3) Impact on the landscape and environment

Policy NH/2 of the 2018 Local Plan, Protecting and Enhancing Landscape Character, says 'Development will only be permitted where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area in which it is located' (the NCA is described as East Anglian Chalk). Policy NH/3:1, Protecting Agricultural Land says 'Planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless: (a) Land is allocated for development in the Local Plan...'.

As noted above, Policy E/12 makes planning approval conditional that '... the scale of development would be in keeping with the category and scale of the village, and be in character and scale with the location.' Policy E/13 requires that it 'would not have an unacceptable adverse impact on the character and appearance of the area and in particular the village edge, and is in scale with the location.' Policy E/16 requires: 'There is no unacceptable adverse impact on the countryside with regard to scale, character and appearance of new buildings and/or changes of use of land. ...'. Policy E/15:1 states that 'Permission will be refused where there would be a negative impact on surrounding countryside, or landscape character.'

#### **Building height**

The present Wellcome Trust application is for a large, dense grouping of diverse buildings, sufficient for over 4000 additional employees, beside an estate of 1500 housing units. This 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. Cambridge City's 2018 Local Plan defines buildings as tall and requiring special permission if they are significantly taller than the buildings that surround them and/or exceeding 19m within the historic City core or 13m outside it (assuming a flat roof with no rooftop plant) (CLP 2018, Appendix F:F9).

The proposed Wellcome Trust buildings are certainly significantly taller than those nearby. The larger ones would, at 20m, be substantially taller than those on the present Genome Campus which the application reports to be all under 11m (5:5.2.5). Hinxton village consists of two storey domestic houses of under 8m except for the Church of St Mary and St John, the tower of which has been measured as 20m. Unlike the present Wellcome Genome Campus (and other nearby technical business areas at Granta Park, Babraham, and Chesterford) which are well hidden from public view by mature trees, 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. In our 3 July 2018 formal response to the Scoping Report we objected to the viewpoints that had initially been proposed by the developers. We asked for a radius of viewpoints greater than the 3k proposed, and we suggested a selection of six that would take account of the broad views of South Cambridgeshire by including high points. Despite the consultants' claim that that they took account of suggestions (10.3.4 and 10.4.19), they ignored our request for three more distant viewpoints. Of the viewpoints they selected, three were relatively close in distance to ones we identified, but all three of these were at lower heights above sea-level than those we requested and had more restricted views.

This is illustrated by Viewpoint 7, the view NNE from Coploe Hill above Ickleton reproduced here. The left-hand picture is from the application documents, with the proposed buildings superimposed in purple and dark blue in the centre. The position from which it was taken was reportedly map ref TL 493426. The Coploe Hill viewpoint we had suggested was TL 495421. The right-hand picture is taken from close to this, at approximately TL493423, about 250m up the Coploe Road from Viewpoint 7. This view is substantially different from their left-hand picture. The proposed Wellcome Expansion Land is the pale brownish arable and woodland strip of rising land across the centre of our right-hand





picture, with the present Genome Campus buildings showing to the left and the A11 to the right. It is clear that the proposed cluster of buildings, of up to 20m height and substantially higher than the existing ones, would in fact be extremely prominent in the local landscape. As it happens, this is the first viewpoint in Cambridgeshire for those arriving from the south on National Cycle Route 11. Long views are a rarity in Cambridgeshire, and the proposed development would sully not only this but other long-distance views that we suggested but which have been ignored.

The application's selection of viewpoints appears designed substantially to understate the visual impact of the proposed development on the surrounding countryside.

The proposal fails the requirement that it 'respects and retains, or enhances the local character and distinctiveness of the local landscape'; it would 'have an unacceptable adverse impact on the character and appearance of the area'; it would have an 'unacceptable adverse impact on the countryside'; and 'there would be a negative impact on surrounding countryside, or landscape character'.

#### **Biodiversity**

The Local Plan's Policy NH/4: Biodiversity requires that 'New development must aim to maintain, enhance, restore or add to biodiversity. Opportunities should be taken to achieve positive gain through the form and design of development. Measures may include creating, enhancing and managing wildlife habitats and networks, and natural landscape.' Its Policy NH/6:2 says 'The Council will encourage proposals which: (a) Reinforce, link, buffer and create new green infrastructure ...'.

The application proposes to protect and to enhance biodiversity in its plans for the Expansion Land. Increasing the diversity of the natural environment with such a development might be achievable on a large enough scale. Enhancing woodland, hedges and margins on the remaining fields around and amongst the buildings on the Expansion Land would be a positive step. But to suggest this might 'maintain, enhance, restore or add to biodiversity' as a whole is disingenuous at two levels. However much the number of natural species might be increased, the fact that most of the site would be permanently subject to human activity and built upon would mean that the total natural undisturbed biomass would be substantially reduced. There would be no net 'positive gain'. It would also mean that many natural species currently present would not remain on the site. While badgers, barn owls and skylarks can be found near to old established settlements, they do not thrive on building sites nor on sites where there are large numbers of people and pets. Pigeons, blue tits and rats might. When even suggestions of 'green' roofs and wildlife ponds are constrained by the phrase 'where feasible' it is apparent that the commitment to biodiversity is extremely weak.

The application culpably omits the clear opportunity the Wellcome Trust has to achieve positive gain through 'creating, enhancing and managing wildlife habitats and networks' on its adjacent land. The Trust owns most of the open land in and around Hinxton village as well as a substantial area of at least 100 ha of agricultural land with woodland and the River Cam running through it (described as Land North of Hinxton). The Wellcome Trust is a corporate supporter of the local Wildlife Trust and works admirably with it to maintain the 6 ha Wetlands Nature Reserve on the present Campus. It has a unique opportunity to do similar work on this precious 3km stretch of the Cam river valley to the north of the Campus. It could, for example, create a Living Landscape with wildlife corridors. This would genuinely enhance wildlife and would publicly signal that the Wellcome Trust intends that the proposed development should improve the Cambridgeshire environment and not simply be a vehicle to provide more financial return.

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.

## Flood control and aquifer protection

The Local Plan's Policy CC/9: Managing Flood Risk requires developers to ensure '1d. There would be no increase to flood risk elsewhere, and opportunities to reduce flood risk elsewhere have been explored and taken (where appropriate), including limiting discharge of surface water (post development volume and peak rate) to natural greenfield rates.' Where there are site specific Flood Risks developers are expected to carry out an Assessment 'appropriate to the scale and nature of development and the risks involved, and which takes account of future climate change'.

The application provides a substantial analysis of flood risks and aquifer recharge on the proposed Expansion Land. But it treats this Expansion Land as largely self-contained. The proposed solutions are far too narrowly focused, especially given the prospect that climate change will bring increased run-off from the site, greater variability of rainfall and hastening aquifer depletion. Discharge from the Expansion Land, whether direct run-off or via the Great Chesterford sewage treatment site, is eventually into the River Cam via Wellcome Trust land. 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. These meadows are naturally flooded at some point in most years.

Among other buildings at risk is the historic Hinxton water mill, owned by Cambridge Past Present and Future (CPPF). The mill race, sluices and associated channels are almost all on Wellcome land. The sluices and race are aged and fragile and their breach would risk flood damage for a substantial distance downstream through Duxford and beyond. Hinxton Parish Council, with CPPF, the Cambridge Trout Club, and the farmer whose family have farmed the land for generations all consider that Wellcome should construct a simple compound weir where the mill race departs from the original river bed. This would pre-empt such a breach. It would also ensure more efficient use of the water meadows for water retention both to recharge a particularly important (because it is deep) section of Cam aquifers and also to protect the lower Cam valley. This would be a low-maintenance solution that would reduce flood risk and provide both environmental enhancement and heritage protection. This has been requested of the Wellcome Genome Campus by Hinxton PC on several occasions but is ignored here as a result of the culpably narrow focus of the application's analysis.

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.

#### 4) 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. Our objections arise from the massive scale of the proposed development on the Expansion Land. The proposed Expansion Land development marks a major shift in the balance of activity on the Campus. At present most activity is fundamental scientific research, conducted by the Sanger Institute and the European Bioinformatics Institute, with some short-term accommodation offered to start-up enterprises. The application proposes modest growth in this work, which we strongly support. It could possibly be contained within the current Campus EEA. But 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 this planning application, which have not appeared in previous applications.

Given the largely unmitigated cost burden on the wider community that is implied by the proposed development, we challenge the need for this shift in strategy. Successful translation of scientific research does not require the extreme proximity of sharing the same site. As others (including SCDC planners) have argued, successful 'clusters' of technologically-driven activity may benefit from those involved being within easy distance of each other, but not from their necessarily sharing canteens and car-parks. The Hinxton Campus is within easy reach of those at Babraham, Granta Park, and Chesterford and there are many places nearby in East Anglia which have cheaper housing, better transport and more labour available. We note that an earlier 'Campus Vision' that Wellcome published in June 2015 indicated (p20) that they then anticipated some 2000 fewer ancillary commercial company employees on the future Campus than the present proposal calls for. The reasons for the substantial growth in numbers appear not to be scientific but financial.

The principal reason for this 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 by renting and leasing premises on its land to other enterprises profiting from applying such work. We understand that, unlike the current Campus, the proposed developments on Expansion Land are the responsibility of the Wellcome Trust's investment arm. The proposed shift in site function may be understandable from the point of view of growing the Trust's finances, but it is not necessary for the success of charitable scientific research. Nor is it necessary for the growth of genome-related employment in Cambridgeshire as a whole.

South Cambridgeshire District Council should consider whether the financial benefits to the Wellcome Trust of the proposed commercial development on the Expansion Land should be allowed to outweigh the consequent substantial and unmitigated increase in economic and everyday costs that would be imposed on the local communities.

#### 5) The proposed housing

The Local Plan's Policy H/10: Affordable Housing requires that 'All developments of 11 dwellings or more ... will provide affordable housing' which is defined by: 'eligibility is determined with regard to local incomes and local house prices'.

We contest aspects of the application relating to housing on several grounds.

i) The application provides for no affordable housing (11.5.19). This appears to be in breach of the Local Plan Policy H/10 requiring provision of affordable housing. Local people and

- their families have as much need for access to affordable housing in this part of South Cambridgeshire as elsewhere.
- ii) There is little evidential basis for the large number of up to 1500 units of accommodation which have been applied for. The reported survey of current employees provides wholly insubstantial evidence (11.1.4; 11.4.9, 10). It would require a rehearsal of plausible alternatives and of terms and conditions on offer to elicit responses of any value. Any rational current employee respondent could be expected to express interest in unspecific offers of Campus housing to keep the option open even if they were unlikely to take it up.
- iii) Wellcome Trust currently owns and lets about ten domestic houses in Hinxton village. We note that the majority of these are rented to people with no connection to the Campus and that others are often unoccupied for long periods (as at the time of writing). This does not suggest pent-up Campus employee demand for housing in the immediate vicinity.
- iv) The model of housing ownership and finance that is proposed (11.5.15-19) does not appear to be sustainable. We are 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 for the 21<sup>st</sup> century. It implies something comparable to tied cottages, with the implication of eviction on loss of job. That carries controversial implications for the human resource management of those residents, whoever they might be employed by on the site.
- v) The application's condition that both rents and housing prices should be at 'market' rates raises challenges for rent and price management, especially if, as Wellcome have informed us, their financing of the housing may be in partnership with the private sector. Such constraints may be appropriate to a churning population of student researchers and post-docs, as is the case with the University's development at Eddington. But it is less likely to appeal to the employees of the commercial enterprises who would be leasing buildings on the Expansion Land, or to the technicians and non-scientific staff on whose continuity the success of the scientific community would depend.
- vi) Since prospects for this hybrid model of 'managed-market tied housing' are so uncertain, it would be gratuitously destructive for the housing plan to proceed on the assumption of up to 1500 units. In particular, there is little justification for the proposal that the substantial belt of established trees facing Hinxton village should be moved or removed before building starts, to make way for the uncertain possibility of so large a settlement.

The very large number of housing units proposed in the application has no adequate justification and appears to be largely for financial return.

#### 6) Meeting community needs and engaging with the local community

The Local Plan places clear requirements on developers' responsibilities to the local community.

Policy SC/4: '1. All housing developments will include or contribute to the provision of the services and facilities necessary to meet the needs of the development. ... 2. The community needs of large scale major developments (individual sites with 200 or more dwellings) ... will be established ... in partnership with the ... stakeholders'; Policy SC/4: 9: 'The timely delivery of services and facilities when they are needed will be required, including the provision of key services and facilities for early phases of the development.'; Policy SC/5: 'Proposals for Community healthcare facilities will be supported within development frameworks'; Policy SC/6 '1. All housing developments will contribute towards the provision of indoor community facilities to meet the need generated by the development. 2. Developments of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in delivery off-site...'; and it is

added that (9.16) '... the extra demands for services and facilities from new residents are provided for in ways that minimize impacts on the existing community.'

It would be hard to exaggerate the likely impact of the Wellcome Trust's proposed development on Hinxton. Our village of 150 houses would be enveloped by what is, in effect, a company town of up to 1500 residential units. Quite apart from the massive adverse implications for transport, landscape and environment, the social implications are colossal. Yet, in thousands of pages of application documentation, no consideration is given to the consequences for our 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. Indeed, very little concrete is offered for the new community in terms of sports facilities, schools, health centre, playground, community hall and so on. We appreciate that this is an outline planning application, and that such details may be developed later; but equally they may not, and our community is being asked to take a great deal on trust.

Clearly displayed in the earlier presentations by Wellcome Trust was an explicit commitment to 'providing local people access to the amenities on site'. In this application we are told that we shall be able to walk around outside the proposed buildings; in other words it is not intended to be a gated community. We would be allowed to use the cycle and footpaths which the Campus proposes to improve for its own employees. We would be permitted to use the on-site shops. The present application is cautious to a fault in suggesting what possible D1 and D2 non-residential institutions 'could' include (community centre, fitness centre etc); it says nothing.

Even the commitment to provide access for 'local people' appears to be constrained. At a public Q&A session that we requested, the answers from Wellcome (dated 14 January 2019) were deeply discouraging. For example:

- 'It is not envisaged that the proposed development would [place] additional pressure on the existing Hinxton village hall. It is proposed that permanent community floorspace provision would be delivered before completion of 500 homes'. Which prompts the question whether the Campus' initial residents are to be denied access to our Village Hall until the proposed new settlement is three times the size of our village.
- 'The current nursery facility is over-subscribed so the expanded facility would prioritise the children of campus workers, however, any surplus places would be available to local children.' In other words the nursery is planned purely as a site human resource facility, not an amenity which 'local people' can rely on.
- In response to a spoken question about a proposed primary school, the answer was that instead of having a primary school on site, a financial contribution might be made to a nearby school. Which would suggest yet more traffic congestion from school runs.

These are not the responses of developers designing a community which is intended to integrate with and contribute to the existing community beside which it would grow.

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'.

### **Community Involvement**

Our experience of engaging with the Wellcome Trust is one of extremes. On the one hand, as one would hope when it is the major land-owner, our relations with the Trust's Genome Campus have

been close and generally very positive. The many Campus employees who live in the village are fully involved and some play leading roles in village life. Our regular liaison meetings between representatives of the Campus management and our Parish Council are administratively well-supported and deal constructively with a wide range of shared concerns. Similarly, the Campus involves us closely in the policy-making of their Wetlands Community Conservation Group. It encourages public involvement in a programme of guided nature walks and in voluntary activities such as coppicing and balsam-pulling in their Wetlands reserve.

On the development of the present planning application, on the other hand, 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. There are some relatively minor matters, for example on aspects of landscaping, on which public views may have been acted upon. On major matters, however, it has been as if we have been talking to the wrong people. Our informed comments about traffic congestion and the need for alternative public transport appear to have been ignored. Our 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.

In our 3 July 2018 formal response to the Scoping Report we placed emphasis on the importance for the local community of the application specifying 'formal procedures to involve existing residents of Hinxton in decisions on any proposed expansion of their village and in its future governance'. The application says no more than that: 'A community liaison group involving local villages and the new community would be established', which implies no more than token involvement at far too late a stage. It confirms the impression of arrogant contempt for the lively community of Hinxton which the application threatens to eclipse.

There has been no serious effort by the Wellcome Trust to develop 'partnership' with our community as 'stakeholders' in this planning application.

#### Conclusion

The planning application is in widespread breach of South Cambridgeshire's 2018 Local Plan. We urge South Cambridgeshire District Council to request the Wellcome Trust to withdraw and reconsider their application in the light of these comments.

William Brown

Chair and on behalf of Hinxton Parish Council

31st January 2019

#### **Appendix**

<u>Data collated by Hinxton Parish Council on traffic queuing time and number of vehicles in each</u> queue at the McDonald's (A505/A1301) roundabout for Nov 2017-Jan 2018 and Dec 2018-Jan2019

- Hinxton Parish Council asked participants to collect data on the length of queue time and the number of vehicles in each queue at the McDonald's/BP roundabout between late November 2017 and January 2018<sup>3</sup> and between late December 2018 and late January 2019 at peak times of weekdays.
- These data demonstrate that the roads around McDonald's roundabout typically reach capacity
  during peak hours with substantial queues that can reach in excess of 70 cars from the southern
  approach and queue times in excess of 20 minutes. Similarly, queues are often observed that
  stretch along the A505 for substantial distances both to the east and west from the McDonald's
  roundabout.
- Comments by the volunteers show that there is currently active avoidance of the McDonald's / BP roundabout if long queues are observed by a car driver or suggested online by Google map traffic data. These comments demonstrate that there is rat-running through local villages like Ickleton and Hinxton to avoid these queues, and this is taking place with the current level of traffic on our road network. For example, a Hinxton resident observed 41 cars within 15 minutes at 08:30 on 23<sup>rd</sup> Jan 2019 using the single track road that passes through Hinxton ford to avoid main road queues.
- Around 20 volunteers during winter 2018, and 13 volunteers during January 2019, recorded data for the queue time, number of vehicles in the queue and the direction of approach to the McDonald's / BP roundabout. The data were recorded during weekday peak hours (between 7am and 10am, and 4pm and 7pm). The volunteers lived in Hinxton, or commuted to the Genome Campus by bus or car, travelling past the McDonald's / BP roundabout on a regular basis.
- Results show the queue time and number of vehicles in each queue, sorted by the direction of the approach to the around McDonald's / BP roundabout and the date and time of day.
- Note that there are fewer data collated on number of vehicles in each queue than for the queue time to reach the McDonald's / BP roundabout. This is simply because a vehicle driver can more easily monitor the time taken waiting in a queue to reach the roundabout, than count the number of vehicles in the queue especially if the queue is long and goes out of direct line of sight. Also, many of the queue lengths were measured by driving away from the roundabout and counting the number of vehicles in the queue waiting on the approach to the roundabout.

<sup>&</sup>lt;sup>3</sup> submitted in response to SmithsonHill AgriTech planning application S/4099/17/OL







