

SUMMARY - ELISABETH GLOVER MRTPI – PLANNING

1. I am Elisabeth Glover, and I am employed by South Cambridgeshire District Council as a consultant Principal Planning Officer.
2. I hold a BA Hons in Urban Studies and Planning and a Master of Planning from the University of Sheffield. I have over ten years of planning experience and I have been a chartered member of the Royal Town Planning Institute since 2016.
3. I was not the case officer responsible for managing the application subject to this appeal, nor was I aware of the proposed development during its determination. Before agreeing to act in this appeal, I reviewed the application documents alongside the case officer's report to the Council's Planning Committee ('OR') and the decision notice, and I satisfied myself that the Council's position was robust in planning terms and that I could provide expert planning evidence in support of it.
4. Whilst I did not author the OR, I have a thorough understanding of the background to the appeal and the Council's case, and I have undertaken an inspection of the site and its surroundings.
5. I confirm that the evidence which I have prepared and provide for this appeal in this proof of evidence is true and has been prepared and is given in accordance with the guidance of the RTPI professional institute and confirm that the opinions expressed are my true and professional opinions.
6. My main proof of evidence sets out the background information and assessment of policy which is relevant to the consideration of the Green Belt harm, other harm, and the case for Very Special Circumstances, that the Inspector identified at the CMC meeting held on 12th December 2022.
7. In Section 3 of my proof, I have set out my assessment of the Appeal Proposal against local Development Plan policies and National Planning Policies which are relevant to the consideration of the scheme with respect to Green Belt matters. Of relevance to the appeal, are South Cambridgeshire Local Plan 2018 spatial policies S/4 (Cambridge Green Belt) and S/7(2) (Development Frameworks), and Green Belt specific policies NH/8 (the Green Belt) and NH/9 (Redevelopment of Previously Developed Sites and Infilling in the Green Belt).

8. I then make an assessment of the Appeal Proposal against Green Belt policies in the National Planning Policy Framework 2021 paragraphs 137, 138, 147 – 150 and set out my considerations with respect to impact on openness.
9. I conclude that it is agreed by all parties that the Appeal Proposals constitute inappropriate development. I consider the Appeal Proposals can only comply with Policy S/4 of the South Cambridgeshire Local Plan (2018), and the NPPF as a material consideration, if it can be demonstrated that very special circumstances exist which clearly outweigh harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal. Further stating, the in principle harm to the Green Belt carries substantial weight in the Planning Balance.
10. In Section 4, I rely on the evidence given by Gail Broom IHBC with respect to heritage harm associated to the total loss of a Non-Designated Heritage Asset. I am satisfied that the Hotel Felix meets the heritage significance criteria to be considered as an NDHA though Architectural Quality, Architectural Style, and Historic Interest.
11. Ms Broom considers the proposal will result in the total loss of a NDHA of moderate significance, the heritage harm here would be significant. Total demolition of the NHDA would result in the complete loss of all heritage significance, and this weighs against the proposal in the planning balance. I conclude that the Appellants' have not properly justified the demolition of the Hotel Felix and as such, the scheme fails to sustain and enhance the significance of the non-designated heritage asset as required by Section 2(d) of Policy NH/14 of the South Cambridgeshire Local Plan 2018.
12. In Section 5, I consider in detail the considerations put forward by the Appellant, which taken together seek to demonstrate very special circumstances exist which outweigh the harm to the Green Belt and any other harm. These considerations include, unmet need for older persons accommodation, specialist dementia care beds, improved choice of care bedspaces, a Dementia Research Facility, release of general housing, community and health benefits, landscape enhancements, biodiversity and job creation and economic impacts.
13. With respect to need for bedspaces, I rely on the evidence provided by Gurdev Singh, the Head of Service at Cambridge County Council for the Adult Social Care Commissioning Directorate. I acknowledge that there is a critical need at a *national policy level* to ensure that there is a sustainable variety of types and tenures of older persons accommodation. However, SCDC's approach to addressing that need at a

local level, through Policy H9, is to provide a wide choice, type, and mix of housing to meet the needs of older people. The County Council's strategy / vision, based on its needs assessment is also to provide a variety of housing typologies and tenures, with optional levels of care.

14. Mr. Singh concludes that although there is a need for additional CQC registered care beds in South Cambridgeshire, and that there is a need for specialist dementia care facilities, the need is at a much lower level than a critical need / shortfall of available spaces. Overall, I conclude that the need for care and dementia care beds to have **moderate weight** in the overall planning balance.
15. In my proof I also acknowledge that the incidences of dementia diagnoses are growing. However, it is my view that this does not simply translate to a blanket need for additional care home bed spaces at a local level, and the County Council's mixed market approach to meeting that need is both relevant and reasonable.
16. As the application does not reference dementia care beds within the description of the development or application form, and as there is no mechanism proposed to secure the delivery of this this benefit, I afford **moderate weight** to the specialist dementia care beds.
17. For the reasons I set out in my Proof of Evidence, I afford improved choice of bedcare spaces, the Dementia Research Facility, the release of general housing, the community and health benefits, landscaping and job creation benefits of the proposals **limited weight** in the planning balance. I afford **moderate weight** to the biodiversity proposals given the generous improvements proposed to Biodiversity Net Gain which could ameliorate some of the harm to the Green Belt arising from inappropriate development.
18. In concluding Section 5, I do not consider there to be a clear or compelling case for need to underpin the case for very special circumstances.
19. I do not consider that the factors put forward carry sufficient weight, individually or collectively, to constitute the very special circumstances required to justify inappropriate development in the Green Belt and to clearly outweigh the identified harm to the Green Belt in addition to the harm from the total loss of a non-designated heritage asset.

20. In Section 6, I consider the overall compliance with the South Cambridgeshire Local Plan 2018 as required by Section 70(2) of the Town and Country Planning Act 1990 (as amended) and Section 38(6) of the Planning and Compulsory Purchase Act 2004.
21. In conclusion, there is overall conflict with the statutory Development Plan and the scheme also conflicts with the NPPF. There are no other material considerations which indicate that permission should be granted. Properly considered, in my view the harms identified including harm to the Green Belt, harm to the Non-Designated Heritage Asset and the lack of a clear and compelling case for very special circumstances to justify inappropriate development would outweigh the benefits of the proposals, whether taken on their own or together. The proposal would not therefore be defined as sustainable development and permission should be refused.
22. The Inspector is therefore requested to dismiss the appeal.