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Date: 02/09/2021

Mary Collins
Senior Planner
South Cambridgeshire District Council

Email only

Dear Ms Collins,

I refer to your email of the 20 August addressed to my colleague Alison Wright received whilst I was on leave. I am sure it will come as no surprise when I relay my client's deep disappointment to receive these comments five months after submission and after two formal pre-application meetings, but we wish to move forward in a positive vein and I will do my best to explain, clarify and where appropriate rebut.

I have split my reply into three parts; the Green Belt, the Heritage Asset, and a fuller explanation of Option 5 and the red line. Alison dealt with the Green Belt issue in some detail in my absence but I add to that for completeness.

1 Green Belt

You say:

"The telling aspect is comparing existing and proposed first floor plans. The proposal includes a lot of additional first floor massing so in the view of Officers, the building is materially larger and does have a greater impact on the openness of the Green Belt than the existing building especially in views from Whitehouse Lane".

This is an assessment against the impact on the openness of the Green Belt significance weight must be given to LVA and GB report submitted to support the application, I see no reference to it within your comments above and reply. Your landscape officer dealing with these issues says: -

'..the impact of the development on the openness of the Greenbelt is negligible due to the existing presence of a similarly functioning and sized building as discussed within the report [LVA]. The new building will be further away from development along White House Lane... The gap between the building and both these developments [along Whitehouse Lane and The Brambles], however, remains deep and open.'

It may be helpful to refer to the LVA and GB Study in more detail - I would refer you to the following extracts (also attached for reference):

8.3.2 Viewpoint 4 [Whitehouse Lane] represent an exceptional case as the proposed development is clearly visible within this view. However, the proposed built form is more compact than the existing and further away from the receptors. As a result, the view benefits of a reduction of visible built form and increased depth into the Site.

9.3.8 The visual and landscape baseline analysis, in fact, suggests that Green Belt within the study area is characterised by an enclosed landscape due to the established green structure and the existing/emerging built form. Therefore, the quality of openness is more strongly associated with a lack of development rather than visual aspects. With this in mind, the more compact form of the proposal increases the undeveloped area of the Site, providing opportunities to enhance the characteristic green qualities of this Green Belt's area.

Also, refer to the images on page 29, Figure 6,7 and 8.

All of these viewpoints were agreed in advance with your landscape officer.

The issue on the impact on openness is not simply a comparison of existing and proposed floor areas as you have done, the approach to the question of whether the new building has a greater impact on the Green Belt is far more nuanced. When a more rigorous contextual approach is taken to the assessment of the existing character and openness, as we have done, it becomes clearer why your landscape officer concluded as she did and why we say that there is no impact on openness. I would hope that you attach great weight to the detailed process we have gone through with your landscape officer in identifying any harm to openness of the Green Belt and not simply substitute your opinion which appears based on a very simple (and in my view flawed basis) of identifying harm.

Your simple overlay of the floor areas not only fails to recognise the conclusions of the GB study and LVA and your own landscape officers' clear conclusions but is also inconsistent with the NPPF and the very clear guidance on approaching the redevelopment of previously developed sites, namely, Paragraph 149 (g), this says in relation to inappropriate development: -

(g) *"limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: –*

- not have a greater impact on the openness of the Green Belt than the existing development; or –

- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

You are in danger of applying two tests in coming to your conclusion on the openness of the Green Belt. You refer to the increase in floor area, but this is not a test under paragraph part (g) this reference is restricted to para 149 (c) and extensions to existing buildings, but that is not relevant to the test in 149 (g) which is a distinct and separate. The test is simply one of openness, we have a very clear recommendation from your landscape officer who not only says there is no greater impact on the openness of the Green Belt but in terms of the setting is an improvement

2. The Non-Designated Heritage Asset

You say: -

"As Conservation have noted, the fifth concept mentioned in the D&A Statement explores this and has the potential to produce a design that retains and enhances the setting of the existing building whilst providing the accommodation required. As Conservation have noted, Officers do not feel this has really been demonstrated why this appears to be such a problem.

I set out below a detailed explanation as to why the fifth option was not pursued.

Table 1. Architecture:

<p>Through the years the building has been heavily extended and altered, both internally and externally. Original elements of the building, such as the glass house, have been demolished and have been replaced with modest quality additions, significantly affecting the quality of the building in question.</p>
<p>From operational point of view, the existing building comes with a number of significant issues including, but not limited to:</p> <ul style="list-style-type: none"> • A variety of corridor widths, with majority well below the recommended 1800mm. • Lack of passing places along corridors for 2 wheelchair users to pass.
<p>Numerous changes in level, with no alternative route - currently there are a number of internal ramps that create restrictions for residents on wheelchairs to move successfully unaided as well as for ambulant people who often find them more challenging than the stairs themselves.</p> <p>The sizes and shapes of current rooms make it difficult to arrange logical and rationalised room layout.</p>
<p>There are recognized structural issues that will be difficult to overcome.</p>
<p>Option 5 proposes utilizing the wings to house bedrooms while the main building would provide communal areas, as it is deemed unsuitable to be converted into bedrooms, however this approach means lounges are located far away, disjointed from the bedroom wings- the approach is potentially distance prohibitive, will discourage the resident from using the facilities.</p>
<p>The option in question suggests building a new structure on previously undeveloped land. The combined GIFA of the existing building (including approved extensions) and the new unit would be 6,295m². For comparison, the proposed new build's GIFA is 4,645m². Similarly, when comparing footprints, the existing building with the new unit combined footprint would be 3,075m² while the proposed full new build only occupies 2,395m². Effectively, option 5 proposes much larger development, with larger combined footprint, stretched across the sites. It would significantly limit the permeability of the site while potentially affecting properties at Thornton CI and the Brambles as we would be building much closer to the rear boundary.</p>
<p>Due to the necessity of providing a vehicular access to two buildings the access road/parking would virtually encircle the existing building. The result would be that only 20 bedrooms in total, 6 bedrooms in the existing building and 14 bedrooms in the proposed, one would have direct access to the residents garden. In comparison, in the new proposal, all bedrooms on the ground floor (40 units) would have access to the resident's garden.</p>
<p>Due to the difference in levels the communal areas within the existing building, that should have the drive to get all the residents together, would not have direct access to the generous residents gardens, unless we construct extensive ramps. This approach would not be recommended when designing a modern care home, the goal is to allow free movement within secured gardens.</p>
<p>The result of accommodating option 5 effectively means running two separate care homes, with two sets of staff to cater for each. Considering that all the service areas are located within the existing building this solution is impractical in a real-life situation.</p>

Table 2. Landscape:

<p>Option 5 Impacts on several of the root protection areas of the existing trees and would also involve the removal of the two cedar trees in the west of the site and parts of the existing mature yew hedge.</p>
<p>It has a larger building footprint. The positioning of the new building in option 5 'urbanises' the site giving it a more built feel losing the rear garden.</p>
<p>Larger visual impact on neighbouring properties and loss of privacy.</p>

Loss of amenity for residents with limited opportunity for terraces and less garden space.
The extent of hard and built area is substantially higher due to extended access roads to the rear. This resulting in loss of green space.
Current proposal focuses the built form on the centre of the site allowing for a generous green buffer enhancing the sites character. Option 5 erodes this green buffer and when viewed in the context of the neighbouring properties alters the character to become more urban.
Loss of biodiversity compared to current proposal due to increase in hard standing / built form.

Table 3. Viability:

	Current proposal	Option 5	Comments
Development cost	£0 uplift in cost	£5.15m (exec VAT) in additional construction costs, and a further £4.82m of additional VAT.	Option 5 more expensive overall, due to dual building approach to achieve solution.
VAT	Not applicable	Applicable	Makes Option 5 more expensive.
Number of buildings	One	Two	Inefficient and requires doubling up of M&E installations which also need to communicate with each other, particularly fire alarm, and potentially complicates the incoming services load/distribution.
m2 GIA/bed	58m2/bed	65m2/bed	Option 5 is less efficient.
Lifts required	2 stretcher lifts	Min 4 (plus possible platform lifts)	Option 5 requires more vertical circulation solutions to overcome levels issues. Existing lifts need to be replaced with stretcher lifts; other lift solutions required to solve ramped corridors.
Basement	Not applicable	Existing retained	Just adds to the complexity of levels which the existing building possesses. This will require smoke ventilation.
Asbestos	Removed with demolition works	Removed while retaining building	Adds premium to option 5 works cost.
Façade repairs	Not applicable	Applicable	Evidence of cracking in façade which will require remediation works to rectify including new window heads/sills, windows, external doors, brickwork, etc.
Repairs elsewhere	Not applicable	Applicable	Dependent on building condition.

Plantroom	Centralised	Split between buildings	Makes for inefficient installation as you are doubling up on primary kit to serve 2 buildings.
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Summary of issues 1-3

As outlined from tables 1-3, it is clear that the retention of the building via Option 5 provides for a poorer care environment for the future residents when compared with a purpose built facility, would be larger with a greater impact on the openness of the Green Belt and would have a greater impact on neighbouring properties. It would be a much less sustainable building and more expensive to run. Table 3 shows that option 5 would be £9.97M more costly in pure development costs and whilst we do have the annualised increase in running costs it would clearly be more expensive more expensive to run.

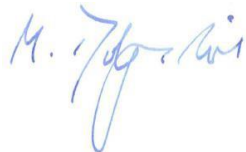
3. The Red line

Again, it is very unfortunate that this issue has been raised after so much time has passed, but it has given us the opportunity to review the title plans. To that end, I have enclosed the title plan which shows that our red line is exclusively within the SCDC jurisdiction and consistent with our title. To further assist, I enclose the Local Plan policy boundary line demarking Girton and the relevant Local Plan insets which also follow the same clear line. All development is contained within the red line.

The application is a major application and I anticipate because of its location will be determined by the JDDC in any event acting on behalf of both authorities.

I look forward to hearing from you and how we resolve matters.

Yours sincerely



Mike Derbyshire
Head of Planning

- Enclosures:
- TVA and GB study extracts
 - Title plan
 - Red line plan
 - Extracts from Local Plan x 2 showing boundary