

Former Hotel Felix, Cambridge
Cassel Hotels (Cambridge) Ltd
APP/W0530/W/22/3307903



PROOF OF EVIDENCE
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Appendix 1

POLICY REVIEW: SOUTH CAMBRIDGESHIRE LOCAL PLAN (2018)

Appendix 2

THIRD PARTY COMMENTS (STATUTORY CONSULTEES)

Appendix 3

THIRD PARTY COMMENTS

Appendix 4

APPELLANT STATEMENT

1.0 Qualifications and Experience

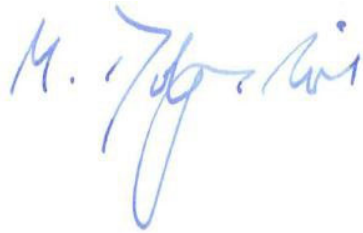
- 1.1 I am Michael John Derbyshire. I am a Chartered Town Planner with over 34 years' experience in the private and public sector. I have a degree in Town and Country Planning obtained from the University of the West of England in 1988.
- 1.2 I am an Equity Partner and Head of Planning at Bidwells LLP, an award-winning practice with offices in Cambridge, Oxford, London, Norwich and Milton Keynes. Bidwells have been practising in the City of Cambridge for 185 years, with our Cambridge HQ comprising over 250 property professionals. We advise 33 of the Cambridge colleges and many of the leading institutions and businesses in the city and surrounding area.
- 1.3 Prior to joining Bidwells, I was a Senior Director at Savills, jointly heading the London office, based in their Mayfair HQ. I dealt with a number of significant projects including the London Clinics Quantum Leap project, a £500million upgrade of their Harley Street Campus including a new Cancer Centre on Devonshire Road; a Hopkins designed flagship school for the Girls' Day School Trust in Hampstead; a MAKE designed residential block on behalf of L&Q in Bermondsey; and the relocation of the world famous Annabel's night club into their new Grade I listed home in Berkeley Square. I also secured permission for the Oakgrove Millennium Community in Milton Keynes on behalf of Crest, a mixed-use 1100 home development.
- 1.4 Before entering the private sector, I spent 16 years in local government. I was Head of Planning and Conservation at Broadland District Council and immediately prior to that was Chief Development Control Officer at Three Rivers District Council. I spent nearly 10 years at the London Borough of Barnet and had two spells at Welwyn Hatfield Council. The last three of these authorities were Green Belt authorities and I have considerable experience in applying Green Belt policy.
- 1.5 I am the Bidwells lead on retirement living, co-ordinating our services to clients across a number of property disciplines and I have spoken at a number of high-profile conferences on the subject.
- 1.6 I was the planning lead on the Hanover Housing proposal at Woodside Square in Haringey, the winner of the "What House" best retirement development award in 2017 designed by Pollard Thomas Edwards Architects. I secured permission for a 70 bedroom care home in Fulbourn in South Cambridgeshire District Council on behalf of XLB Henderson in 2018. The Council accepted the need for the accommodation as a very special circumstance with that planning application.
- 1.7 I also regularly act as an expert witness in the High Court and Upper Tribunal on planning issues related to claims under S84 of the Law of Property Act 1925. I acted as

the expert witness in the 'Candy Striped House' case in Kensington which went through a number of the lower courts before being resolved in my client's favour in the High Court.

- 1.8 I am a delivery board member of the Cambridge Norwich Tech Corridor and I lead on the production of a Spatial Vision for this area.

Statement of Truth

- 1.9 I confirm that I have made clear which facts and matters referred to in this Proof of Evidence are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.



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Date: 9 January 2023

Mike Derbyshire, Head of Planning

Equity Partner

2.0 Introduction

Scope of Evidence

- 2.1 I am instructed by the Appellant, Cassel Hotels (Cambridge) Ltd in respect of the Former Hotel Felix [‘the appeal site’].
- 2.2 The ownership of the site has transferred from Cassel Hotels (Cambridge) Ltd to KYN Cambridge Limited. This transfer occurred after the application was submitted. KYN Cambridge Limited is an umbrella company with Cassel Hotels (Cambridge) Limited still existing beneath it. The appeal has been submitted in the name of Cassel Hotels (Cambridge) Ltd.
- 2.3 My Proof of Evidence is submitted in response to the decision of South Cambridgeshire District Council [“the Council”] to refuse an application for detailed planning permission with the reference 21/00953/FUL [“the development” or “the appeal scheme”]. The decision was taken contrary to the advice of the Council’s officers.
- 2.4 The remainder of my evidence is structured as follows:

Section 3: Sets out the background to the case.

Section 4: Assesses the appeal scheme against the development plan.

Section 5: Assesses the harm from the proposed development.

Section 6: Identifies the matters that constitute “very special circumstances” in the determination of the appeal.

Section 7: Considers the overall planning balance.

Section 8: Sets out the reasons of refusal and explains why these are not well-founded.

Section 9: Provides commentary on the comments received by third parties on the scheme.

Section 10: Sets out my conclusions as to why planning permission should be granted.

3.0 Background

- 3.1 The appeal site lies outside of the Girton Village 'Development Framework', within the open countryside and Cambridge Green Belt.
- 3.2 The appeal site comprises a large 52-bedroom hotel set in landscaped grounds and accessed via a drive from Whitehouse Lane off Huntingdon Road. The hotel is now permanently closed.
- 3.3 The building is comprised of an original Victorian main house with later extensions in the form of single storey and two-storey wings to the side and rear. It is located between the Thornton Road housing estate to the west and the buildings on Whitehouse Lane to the east.
- 3.4 The building has a Certificate of Immunity, which prevents it being listed by Historic England.
- 3.5 The site lies within Flood Zone 1.
- 3.6 There are a number of trees within the site, including some subject to a Tree Preservation Order (TPO). (An additional provisional TPO was served on 4 March 2021 but it then fell away as it was not confirmed.)
- 3.7 Public footpath 39/48 runs north-south along Whitehouse Lane which also forms a cycle route to the Darwin Green residential development. Immediately to the east of the site lies the boundary of the area within the jurisdiction of Cambridge City Council.
- 3.8 The appeal seeks full planning permission for the demolition of the existing buildings on site and to construct a care home comprising 80 bedrooms. The proposed care home would be supported by external amenity space, access, parking and landscaping arrangements, and other associated works. The description of development identified on the decision for application reference 21/00953/FUL is agreed.
- 3.9 The application was submitted and validated on 1 March 2021.
- 3.10 The supporting Design and Access Statement [CD18] explained that five options had been considered as to how to utilise the existing building. Further to review of these options, retention of the building was found to be both "imprudent and infeasible", as outlined in the statement. Hence, demolition of the building is sought.
- 3.11 The new care home would deliver care facilities provided by the Applicant.

Statutory consultee responses and proposal revisions

- 3.12 During the assessment of the application, South Cambridgeshire District Council consulted internal and external technical professionals and other consultees. I comment on these at Appendix 2.
- 3.13 In response to comments received, the Appellant updated the plans where necessary. These were reconsulted upon accordingly.

Officer recommendation

- 3.14 Officers prepared a report on the proposal for the Planning Committee meeting held on 13 July 2022 [CD91]. The recommendation was that that the Council grant planning permission subject to the completion of a section 106 agreement alongside a series of planning conditions.

Reasons of refusal

- 3.15 Contrary to the officer recommendation, the application was refused by South Cambridgeshire District Council's Planning Committee for the following three reasons:

1) The site is located outside of the development framework boundary of Girton, within the countryside and Cambridge Green Belt. The proposed development would represent inappropriate development that is, by definition, harmful to the Green Belt in policy terms as the development does not fall within any of the exception criteria within paragraphs 149 or 150 of the National Planning Policy Framework 2021. The proposal is therefore contrary to Policy S/4 of the South Cambridgeshire Local Plan 2018 and paragraphs 147, 148, 149 and 150 of the National Planning Policy Framework 2021 that seek to resist inappropriate development in the Green Belt.

2) In addition to harm caused by inappropriateness, the proposed development would result in the loss of a non-designated heritage asset to the detriment of the character and appearance of the area. In taking a balanced a judgement, the loss of the non-designated heritage asset is considered to cause substantial harm as it would fail to sustain or enhance the significance of the asset and the overall benefits of the scheme are not considered to outweigh the harm identified. The proposal is therefore contrary to paragraph 203 of the National Planning Policy Framework 2021 and policy NH/14 of the South Cambridgeshire Local Plan 2018.

3) The application has failed to provide very special circumstances including the need for specialist housing which, taken individually or collectively, demonstrate why the harm by reasons of inappropriateness in the Green Belt and other harm identified, being the loss of the non-designated heritage asset, is clearly outweighed by these

considerations. The application therefore fails to satisfy the requirements of paragraphs 147 and 148 of the National Planning Policy Framework 2021.

The Appellant's witnesses

- 3.16 In addition to my planning evidence, the Appellant will be calling the following witnesses to give evidence to this inquiry:
- Architect: Melissa Magee (Architect and Managing Director, Carless & Adams)
 - Heritage: Kate Hannelly-Brown (Partner - Heritage Bidwells).
 - Need: Jessamy Venables (Director, Carterwood).
 - Green Belt, Landscape and Townscape Impact: Martina Sechi (Associate - Head of Landscape and Townscape Assessment, Bidwells).
- 3.17 Also appended to my evidence is a Statement from David Roe, the Origination, Land and Planning Director for KYN. It is not currently intended to call Mr Roe to give evidence, but in his statement, he provides more information about KYN's background and its approach to care in its facilities.

4.0 Development Plan

- 4.1 Planning decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.
- 4.2 The statutory adopted development plan, insofar as it relates to this appeal, comprises the South Cambridgeshire Local Plan (2018) (“the Local Plan”) [CD100].
- 4.3 When reaching a conclusion on whether a proposed development is compliant with the Local Plan, I must make a judgement based upon the development plan as a whole.
- 4.4 I carry out a detailed assessment of compliance with individual policies at Appendix 1.
- 4.5 My assessment of the scheme’s compliance with the development plan is as follows:

Presumption in favour of sustainable development

- 4.6 Policy S/3 ‘Presumption in Favour of Sustainable Development’ of the Local Plan states:
- “1. When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals that accord with the Local Plan and Neighbourhood Plans can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area unless material considerations indicate otherwise.*
- 2. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:*
- a. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- b. Specific policies in that Framework indicate that development should be restricted”.*
- 4.7 The National Planning Policy Framework has been revised since the Local Plan was adopted in 2018. However, as I shall explain in detail below, I consider that the proposal complies with both the development plan and the NPPF.

Cambridge Green Belt

4.8 Policy S/4 ('Cambridge Green Belt') of the Local Plan states:

"A Green Belt will be maintained around Cambridge that will define the extent of the urban area. The detailed boundaries of the Green Belt in South Cambridgeshire are defined on the Policies Map, which includes some minor revisions to the inner boundary of the Green Belt around Cambridge and to the boundaries around some inset villages. New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework".

4.9 In addition, Policy NH/9 ('Redevelopment of Previously Developed Sites and Infilling in the Green Belt') of the Local Plan states:

"Redevelopment of Previously Developed Sites and Infilling in the Green Belt will be inappropriate development except for:

a. The re-use of buildings provided that the buildings are of permanent and substantial construction, are consistent with Policies E/17 and H/17, provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt;

b. The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

c. The replacement of a building, provided the new building is in the same use, and not materially larger than the one it replaces;

d. Limited infilling, where infilling is defined as the filling of small gaps between existing built development (excluding temporary buildings). Such infilling should have no greater impact upon the openness of the Green Belt and the purpose of including land within it than the existing development. The cumulative impact of infilling proposals will be taken into account;

e. The partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development".

4.10 The appeal site is located within the Cambridge Green Belt, between Cambridge and the settlement of Girton. The site represents 'previously developed land' with the existing Hotel Felix still on the site.

4.11 The proposed building would have a slightly greater footprint and gross internal floor area than the current building on the site, such that the Appellant (and I) accept that the proposal constitutes "inappropriate development" in the Green Belt for the purpose of Policy NH/9. To confirm the extent of increase:

a) the built footprint would increase from 2,110m² (existing building) to 2,395m² (proposed building);

b) the gross internal floor area would increase from 4,365m² (existing building) to 4,645m² (proposed building).

4.12 Policy S/4 states that *“new development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework”*.

4.13 The NPPF identifies the five purposes of the Green Belt, which are discussed more fully below in Section 5.0 ('The Harm'). By virtue of Policy S/4, it is necessary to consider these Green Belt purposes, and the other Green Belt policies of the NPPF, when assessing compliance with the development plan.

4.14 Paragraph 147 of the NPPF states: *‘Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’*. Paragraph 148 states: *‘When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations’*.

4.15 In Section 6.0 below, I consider whether there are any “very special circumstances” in the present case.

Heritage

4.16 Policy NH/14 'Heritage Assets' of the Local Plan states the following:

“1. Development proposals will be supported when:

a. They sustain and enhance the special character and distinctiveness of the district’s historic environment including its villages and countryside and its building traditions and details;

b. They create new high-quality environments with a strong sense of place by responding to local heritage character including in innovatory ways.

2. Development proposals will be supported when they sustain and enhance the significance of heritage assets, including their settings, as appropriate to their significance and in accordance with the National Planning Policy Framework, particularly:

c. Designated heritage assets, i.e. listed buildings, conservation areas, scheduled monuments, registered parks and gardens;

d. Non-designated heritage assets including those identified in conservation area appraisals, through the development process and through further supplementary planning documents;

e. The wider historic landscape of South Cambridgeshire including landscape and settlement patterns;

f. Designed and other landscapes including historic parks and gardens, churchyards, village greens and public parks;

g. Historic places;

h. Archaeological remains of all periods from the earliest human habitation to modern times.

[paragraph 6.49 of the text supporting the policy then adds:

“The conservation of heritage assets does not prevent all change but requires it to be managed in a way which does not compromise heritage significance and exploits opportunities for enhancement. Section 12 of the NPPF (2012) provides guidance regarding the consideration of development proposals on heritage assets. In summary the more important the asset, the greater the weight should be applied to its conservation. Where development would lead to the substantial harm or total loss of significance of a designated asset, the local planning authority should refuse consent unless demonstrated it is necessary to achieve substantial public benefit that outweigh the harm or loss. Proposals leading to less than substantial harm to the significance should also be weighed against public benefits of the proposal. For proposals affecting non-designated assets a balanced judgement will be made, having regard to the scale of any harm or loss and the significance of the heritage asset.”.] (emphasis added)

- 4.17 Hotel Felix is not a listed building nor is it within or adjacent to a conservation area. Furthermore, the building has an extant Certificate of Immunity which prevents such listing. Additionally, permitted development rights outside of the development plan would allow for the demolition of this building.
- 4.18 The Council considers that the building represents a non-designated heritage asset as described by its Conservation Officer in his comments dated 2 July 2021 [CD77] and repeated in comments made 7 February 2022 [CD85]. It is accepted that the former hotel is a non-designated heritage asset, therefore Policy NH/14 is engaged.
- 4.19 Mrs Hannelly-Brown sets out in her evidence the significance of the building, which is low. Whilst the proposal would result in the demolition (and therefore the loss) of the building, I carry out the balanced judgement required in Section 7.0 of my evidence.
- 4.20 The Conservation Officer stated in his latter comments that the loss of a non-designated heritage asset can be mitigated by the quality of what replaces it. The Council’s planning

case officer concluded in her report for the Council's Planning Committee ("the Committee Report") that the loss of the hotel building currently on the site would be acceptable.

- 4.21 The new building is to be of a high design quality, as accepted in paragraph 10.48 of the Committee Report [CD91]. Melissa Magee expands on the quality of the design in her proof of evidence. The Council's Conservation Officer did not raise any design-based objections to the proposal in either set of comments on the application, nor did he suggest that the development would impact upon other existing heritage assets nearby. The Conservation Officer objected only to the loss of the building.
- 4.22 I acknowledge that the building is a non-designated heritage asset, but the significance of that asset is low. As there are no designated or non-designated assets nearby, the proposal would not have an unacceptable impact upon any such assets. Rather, the proposal would contribute to enhancing the design and character of the immediate environment with the proposed design taking cues from the existing building, as described in the next section below ('Design, character and appearance').
- 4.23 The proposal would enhance the distinctiveness of this area through high-quality design and create a sense of place in accordance with Policy NH/14. Whilst I accept that it would not sustain or enhance the significance of the non-designated heritage asset as the proposal would involve its demolition, the text supporting Policy NH/14 requires a balancing exercise to be undertaken, which I carry out in Section 7.0 below. I conclude there that the balance comes down in favour of demolition. The appeal proposal therefore complies with Policy NH/14 of the Local Plan.

Design, character and appearance

- 4.24 Policy HQ/1 'Design Principles' of the Local Plan specifies a series of criteria to ensure high quality design and that developments contribute positively to their surroundings.
- 4.25 The proposed building's footprint and gross internal floor area have been designed to meet the operational needs of the 80-bed care home. At the same time, architectural cues have been incorporated in the design to reflect features associated with the existing building. These include the recesses to the elevations, along with varied ridgelines, to minimise bulk and create a more dynamic built form, with the proposed fenestration breaking up the elevations themselves. The proposed care home would also be sited across the footprint of the existing hotel, with sufficient separation distances to respect the Green Belt and views around the site.
- 4.26 The Council has accepted the proposal is of high architectural quality.
- 4.27 The proposal therefore accords with Policy HQ/1 of the adopted development plan.

Trees

- 4.28 Policies NH/2 'Protecting and Enhancing Landscape Character', NH/4 'Biodiversity' and HQ/1 'Design Principles' seek to protect and enhance existing trees and hedges.
- 4.29 The scheme is supported by a tree survey and arboricultural impact assessment which explains why some trees on the site need to be relocated [CD26, CD47, CD48]. The Tree Officer has raised no objection [CD73] and agreement was reached in principle (prior to the Council's refusal) to supply a tree protection plan and arboricultural method statement through an appropriate planning condition.
- 4.30 Accordingly, the proposal accords with Policies NH/2 'Protecting and Enhancing Landscape Character', NH/4 'Biodiversity' and HQ/1 'Design Principles' of the Local Plan.

Biodiversity

- 4.31 Policy NH/4 of the Local Plan states that proposals to conserve or enhance biodiversity will be permitted. The policy states that significant harm to a species or population cannot be supported without adequate mitigation for any species affected.
- 4.32 In addition, the Local Plan is supported by the Biodiversity SPD (2022). This requires proposals to deliver a net gain in biodiversity following a mitigation hierarchy which is focused on avoiding ecological harm and then, in order down the hierarchy, minimising, rectifying, reducing and then off-setting ecological harm.
- 4.33 The application was supported by a preliminary ecological appraisal [CD31] as well as a biodiversity net gain ("BNG") assessment [CD27]. The Council's Wildlife Officer raised no objection to either the ecological appraisal or the BNG assessment [CD66], with the BNG assessment recognising a gain of 74.49% in habitats and a 38.72% gain in linear features (such as hedgerows, for example). Defra has subsequently introduced Metric 3.1, but the Council takes no issue with this in its statement of case (paragraph 5.61, CD120).
- 4.34 With no objections from the Council's Wildlife Officer, and with the assessment showing an enhancement to ecology without any adverse harm to species, the proposal is compliant with Policy NH/4 of the Local Plan and the Biodiversity SPD [CD103].

Flood risk and water management

- 4.35 Policies CC/7 'Water Quality', CC/8 'Sustainable Drainage Systems' and CC9 'Managing Flood Risk' seek to ensure water is appropriately managed on sites, without any adverse increase in flood risk.

- 4.36 The site is situated on land within Flood Zone 1, which corresponds to the lowest risk of flooding to the site and its immediate neighbours. With regards to surface water drainage, the lead local flood authority states that surface water from the development can be discharged via an existing 300mm diameter outfall pipe to the watercourse to the east of the site. Permeable paving would also be used as part of the management of water drainage.
- 4.37 The lead local flood authority raised no objections to the development, subject to technical details of a drainage scheme being secured under condition [CD79]. This is required by condition 3 set out in the Committee Report. Overall, the scheme accords with Policies CC/7 'Water Quality', CC/8 'Sustainable Drainage Systems' and CC9 'Managing Flood Risk'.

Carbon reduction and sustainable design

- 4.38 Policies CC/1 'Mitigation and Adaption to Climate Change', CC/3 'Renewable and Low Carbon Energy' and CC/4 'Water Efficiency' seek to embed principles to adapt to and mitigate the effects of climate change within development schemes.
- 4.39 Additionally, the Council has adopted a Sustainable Design and Construction SPD (2020) [CD102]. This SPD provides a framework to enable applicants to demonstrate that proposals have been designed to minimise the carbon footprint, energy and water consumptions of schemes and thus aid compliance with the Local Plan. For the purposes of sustainability, I recognise that the reuse of a building would normally be favoured over the demolition of existing structures to enable new buildings to be built. However, the building is not fit for purpose to continue operating through its current fabric (see CD37).
- 4.40 The proposed care home has been designed with climate change adaptation and sustainability embedded into the scheme. An Energy Statement [CD27] was submitted with the application, along with a later revision [CD44], to demonstrate a 'fabric first' approach to reduce energy demands. The Council's Sustainability Officer raised no objections, with planning conditions recommended.
- 4.41 The scheme represents a highly sustainable development, in place of the existing building. The proposal accords with Policies CC/1 'Mitigation and Adaption to Climate Change', CC/3 'Renewable and Low Carbon Energy' and CC/4 'Water Efficiency' of the Local Plan, as well as the requirements of the SPD.

Highway safety and transport

- 4.42 Policy TI/2 'Planning for Sustainable Travel' and Policy TI/3 'Parking Provision' seek to ensure the proposal is supported by appropriate sustainable transport measures, whilst

incorporating appropriate cycle and vehicular parking. These policies are supported by Policy HQ/1 'Design Principles' to ensure safe and convenient access to all users.

- 4.43 A Transport Assessment has been prepared for the proposal [CD22, CD41] to identify access via Whitehouse Lane. The County Council's highways officers raised no objections to the content of this document or to the scheme.
- 4.44 With regards to parking, 22no. cycle stands, within a cycle store, are proposed to comply with the requirement of 1 cycle stand per 2 staff working at the same time. For vehicular parking, the standard is 1 car parking space for residential staff plus 1 car parking space per 3 bed spaces. The number of parking spaces proposed, 31 spaces, is considered to be acceptable by officers.
- 4.45 Accordingly, the proposal is in accordance with Policy TI/2 'Planning for Sustainable Travel' and Policy TI/3 'Parking Provision' of the Local Plan.

Amenity

- 4.46 Paragraph (n) of Policy HQ/1 'Design Principles' requires proposals to *'Protect the health and amenity of occupiers and surrounding uses from development that is overlooking, overbearing or results in a loss of daylight or development which would create unacceptable impacts such as noise, vibration, odour, emissions and dust'*.
- 4.47 With regards to neighbouring occupiers, firstly dwellings served by Thornton Close, there are approximately 13 metres to the common boundary and approximately 27 metres between these neighbouring dwellings and the proposed care home. The residential properties to the north-west, via The Brambles, would be approximately 43 metres from the proposed development. Given this separation, there would be no unacceptable overlooking, overbearing or shadowing impacts.
- 4.48 The development was assessed against the ten HAPPI principles (Housing our Ageing Population Panel for Innovation) to achieve good design for care homes. Future residents would have approximately 43.5sqm of accommodation floorspace. Residents would have access to wet rooms, internal seating areas and garden spaces, which would provide high quality amenity. All rooms would have sizable windows and good outlook. External terraces would also be available to enhance the amenity of future occupiers further within this care home setting.
- 4.49 The proposal is in accordance with Policy HQ/1.

Health and well being

- 4.50 Policy SC/2 'Health Impact Assessment' requires new development to have a positive impact upon the health and wellbeing of residents. The policy is supported by the Council's Health Impact Assessment SPD [CD104].
- 4.51 The submitted Health Impact Assessment has been assessed by the Council's Health Development Officer, who has given the assessment an 'A' grade and confirmed that it reflects the requirements of the SPD. No objection was raised by the Officer.
- 4.52 The proposal accords with Policy SC/2 of the Local Plan.

Need

- 4.53 Policy H/9 'Housing Mix' seeks to deliver a wide choice, type and mix of housing to meet the needs of different groups, including older people. In addition, the Greater Cambridge Housing Strategy 2019 – 2023 [CD105] reiterates the need to build accommodation for a rapidly aging population in the Greater Cambridge area.
- 4.54 The Council have previously accepted, when responding to other proposals that were allowed at appeal, that there is an unmet need for older people's accommodation in its area. A full account of the Council's position in these other cases is provided in Section 6.0 ('Very Special Circumstances') below.
- 4.55 The Local Plan does not have a specific policy for the delivery of care homes in the authority area. However, paragraphs 7.38 and 7.39 state the following:

[7.38] *'The population of the district is ageing and often older people need or prefer smaller properties that are easier to manage than their original home, with people often looking to 'downsize' to a smaller property. We also know that as people age the incidence of disability and frailty also increase, and in the age band 64-74 up to 7% of residents will be classified as frail. The Cambridgeshire Joint Strategic Needs Assessment for Older People (2010) recorded that 5% of older people received a disability living allowance and that by 2020 the prevalence of people with diabetes is expected to be 7.4%, 6% with cardiovascular disease and 2.7% with chronic obstructive pulmonary disease'.*

[7.39] *'There are a range of models that can play a part in providing specialist accommodation for older people. These include sheltered and enhanced sheltered housing, Extra Care housing, retirement villages, continuing care retirement communities and registered care homes both with and without nursing care. Where appropriate, specialist accommodation for the elderly should be provided on a mixed-tenure basis, and such accommodation should be located on sites in new settlements or within larger villages. Where any scheme providing specialist accommodation for the*

elderly (with or without care) includes an affordable housing component, this can count towards the overall 40% affordable housing requirement if part of a wider development’.

- 4.56 On page 133 of the Local Plan, the ‘Key Facts’ section identifies that the district has an aging population with growth forecasts of 95% for the 60-74 age group between 2001 to 2021, and 108% for those over 75+ years of age over the same period.
- 4.57 Despite these statements, and in spite of paragraph 11(a) of the National Planning Policy Framework urging that plans should positively seek opportunities to meet the development needs of their area, the development plan does not contain any policies that proactively seek to deliver accommodation for older people.
- 4.58 As explained above, the Council has accepted very recently when responding to other proposals that there is a pressing need to provide accommodation for older people and that very significant weight should be attached to this need. I am very surprised that the Council does not appear to be taking the same approach in response to the current appeal proposal.
- 4.59 The proposal would provide older people’s accommodation housing in accordance with Policy H/9 ‘Housing Mix’ of the Local Plan and help to meet local needs.
- 4.60 I deal with the relevant Green Belt Development Plan Policy, Policy S/4 ‘Cambridge Green Belt’ and its interaction with the Framework later in my evidence when I consider the question of ‘very special circumstances’. I expand on the need case within that section.

Construction and Environmental Health Impacts

- 4.61 Policies CC/6 ‘Construction Methods’, CC/7 ‘Water Quality’, SC/9 ‘Lighting Proposals’, SC/10 ‘Noise Pollution’, SC11 ‘Contaminated Land’, SC/12 ‘Air Quality’ and SC/14 ‘Odour’ seek to ensure that impacts that may arise during the construction period (for example, noise, odour, dust, dirt etc.) are managed and mitigated appropriately.
- 4.62 The Council’s Environmental Health team raised no objections to the application, subject to appropriate mitigation [CD89]. As such, the proposal accords with all the Local Plan policies mentioned in the previous paragraph.

Broadband

- 4.63 Policy TI/10 ‘Broadband’ requires new development to contribute towards the provision of infrastructure suitable to enable high-speed broadband delivery.

- 4.64 Officers proposed a condition (condition 26) within the Committee Report [CD91] to ensure this provision. Therefore, the proposal would comply with Policy TI/10 'Broadband' of the Local Plan.

S106 / Planning Obligations

- 4.65 Reg. 122(2) of the Community Infrastructure Levy Regulations 2010 require LPAs to assess any suggested planning obligation against the tests of being (i) necessary to make the development acceptable in planning terms; (ii) directly related to the development; and (iii) fairly and reasonably related in scale and kind to the development.

- 4.66 Policy TI/8 'Infrastructure and New Developments states that:

'1. Planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms. The nature, scale and phasing of any planning obligations and/or Community Infrastructure Levy (CIL) contributions sought will be related to the form of the development and its potential impact upon the surrounding area.

2. Contributions may also be required towards the future maintenance and upkeep of facilities either in the form of initial support or in perpetuity in accordance with Government guidance'.

- 4.67 Girton Parish Council requested an obligation in relation to burial services, which the Council's Section 106 Officer stated would mitigate the impact of the development by contributing towards the costs of providing burial plots. The Appellant is willing to provide the obligation requested as it is satisfied that it complies with Policy TI/8 of the Local Plan.

- 4.68 I shall return to my judgement on overall compliance with the development plan when I consider the issue of very special circumstances below.

5.0 The Harm

Green Belt and Landscape Harm

- 5.1 Paragraph 147 of the NPPF states that inappropriate development in the Green Belt is harmful to the Green Belt and that such development should only be granted in 'very special circumstances'.
- 5.2 Paragraph 148 of the NPPF states that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.3 As explained above, it is accepted that the proposed development is 'inappropriate development' in these policy terms. This is sometimes described as 'definitional' harm for the purposes of para. 149 of the NPPF and Policies S/4 'Cambridge Green Belt' and NH/9 'Redevelopment of Previously Developed Sites and Infilling in the Green Belt' of the Local Plan.
- 5.4 To determine the extent of harm to the 'openness' of the Green Belt, the impact of the proposal on the spatial and visual characteristics of 'openness' must be considered. Following this, any harm to landscape character (as distinct from harm to openness) must be considered. Finally, it is then necessary to consider if the proposal would have any visual effects that have not already been taken into account as part of the assessment of impact on openness. I cover these matters below.

1) Green Belt Openness

- 5.5 The building replaces an existing building with a slightly larger building but relocates it (again slightly) within the site so as to have a beneficial effect on the openness of the Green Belt; both Melissa Magee and Martina Sechi expand on this in their evidence. The Council's landscape officer helpfully concedes that the impact on the openness is "negligible" (CD76) and that the removal of some of the existing surface car parking and its replacement with landscape improves the openness. Martina Sechi concludes that the proposal will not alter the landscape and visual baseline qualities of the Site and its environs, resulting in no harm to the perceived openness of the Green Belt. The Council takes a different view but not one that is significantly different: the Council's view is that the harm to openness would be negligible.

2) Landscape and Townscape Impact

- 5.6 Drawing on the LVA and Green Belt Study, Martina Sechi concludes that the proposal would not result in adverse effects on local landscape or townscape character (Table 2, page 22 of CD20).

3) Visual Impact

- 5.7 As Martina Sechi explains in her proof of evidence, the visual quality of the context along Whitehouse Lane would not only be preserved but improved by the proposed landscaping scheme and the reduced visual intrusion of the proposed built form compared to the existing Hotel Felix.

Summary

- 5.8 Whilst there is harm due to the development being ‘inappropriate’ in policy terms, the Appellant’s case is that the proposal would cause no harm to the perceived openness of the Green Belt, nor result in any other harmful landscape or visual impacts. The Council’s evidence (which for the purposes of analysis, I am content to adopt given that it is not significantly different from the Appellant’s evidence) is that there would be, at most, negligible harm in these terms in addition to the ‘definitional’ harm of being inappropriate development.

Protecting Green Belt Land – Green Belt Purposes

- 5.9 Paragraph 137 of the NPPF confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence.
- 5.10 There are five key purposes of including land within a Green Belt, as set out in paragraph 138 of the NPPF. These are:
- “(a) to check the unrestricted sprawl of large built-up areas;*
 - (b) to prevent neighbouring towns merging into one another;*
 - (c) to assist in safeguarding the countryside from encroachment;*
 - (d) to preserve the setting and special character of historic towns; and*
 - (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*
- 5.11 In terms of the five Green Belt purposes set out in paragraph 138 of the NPPF, the development does not conflict with any of them, as demonstrated below:
- (a) to check the unrestricted sprawl of large built-up areas;*
- The proposed building appears, on the whole, more compact and less extensive than the existing building on site, so there would be no added sprawl.
- (b) to prevent neighbouring towns merging into one another;*

The proposed care home would be constructed on previously developed land and predominantly use the footprint of the existing building. The proposal would not decrease the established separation between Girton and Cambridge.

(c) to assist in safeguarding the countryside from encroachment;

This is the only purpose that the Council considers the proposal to be in conflict with. In its Statement of Case [CD120], the Council states that the proposal would result in a 'degree of encroachment' into the open countryside (paragraph 5.5). I disagree and defer to Martina Sechi's evidence on this point.

(d) to preserve the setting and special character of historic towns; and

No conservation areas or listed buildings would be unacceptably impacted upon by the proposed development.

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The proposal utilises previously development land and therefore the scheme represents a 'recycling' of this land.

- 5.12 Accordingly, the appeal scheme does not in any material way detract from any of these purposes of including land within the Green Belt.
- 5.13 As well as advising that the proposal would cause only negligible harm to openness, the Council's landscape officer has also stated that *benefits* to the openness of the Green Belt would be secured by the reduction to the surface car park to the front of site, and the curved configuration of the entry route, both of which would reduce the visual impact of the development on the site as seen from Whitehouse Lane. The additional landscaping that would be achievable after reducing the car park area would increase the visual separation between the proposed building and Whitehouse Lane, as well as improving the character and openness of the surrounding area.
- 5.14 In that vein, Martina Sechi, in her proof of evidence, concludes in light of the findings of the submitted Landscape and Visual Appraisal and Green Belt Study (Bidwells, February 2021) [CD20] that whilst the proposal would be slightly larger than the existing building, it would not adversely alter the openness and other existing qualities of the Cambridge Green Belt and Girton Gap. Conversely, the proposal will result in *improvements* to openness by increasing the perceived gap between Girton and the edge of Cambridge, reinforcing landscape features and reducing the amount of surface car park along Whitehouse Lane.
- 5.15 A planning condition requiring the submission and approval of details of a landscaping scheme was considered necessary by the case officer. I agree. I am satisfied that the proposal would not have unacceptable landscape or visual impacts.

- 5.16 In summary, therefore, the proposal would not result in any significant harm in relation to openness or in any other respect. The proposed building would be spatially well-related to the settlement edge, predominantly built on the footprint of the existing hotel, with additional landscaping proposed alongside the reduction of the existing car parking provision and the re-configuration of the entry route.

Heritage Harm

- 5.17 The second reason of refusal referred to the proposed loss of a non-designated heritage asset. The refusal reason states that *“In taking a balanced judgement, the loss of the non-designated heritage asset is considered to cause substantial harm as it would fail to sustain or enhance the significance of the asset and the overall benefits of the scheme are not considered to outweigh the harm identified”*. The proposed development is therefore said to be contrary to paragraph 203 of the NPPF and Policy NH/14 ‘Heritage Assets’ of the Local Plan.
- 5.18 Paragraph 203 of the NPPF states: *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*.
- 5.19 The ‘balanced judgement’ requires having regard to the scale of any harm or loss caused by the proposal and the significance of the heritage asset.
- 5.20 In her proof of evidence, Kate Hannelly-Brown accepts that the proposal would result in the loss of the non-designated heritage asset on the site. However, as this non-designated heritage asset is of a low level of heritage significance, its loss would, correspondingly, be only of low level of significance.
- 5.21 Paragraph 6.49 of the text supporting the Local Plan requires the same balanced judgement to be applied as is required by paragraph 203 of the NPPF. I return to all issues of planning balance in Section 7.0 below.

Summary

- 5.22 The removal of a building with a low level of heritage significance would amount to a loss of a low level of significance. This loss should be weighed in the balance against other countervailing planning considerations.

6.0 Very Special Circumstances

The National Planning Policy Framework (2021) and National Planning Practice Guidance (NPPG)

- 6.1 It will be recalled that paragraph 147 of the NPPF states that inappropriate development in the Green Belt is, by definition, harmful and should only be permitted in ‘very special circumstances’.
- 6.2 Paragraph 148 of the NPPF states that ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.3 I set out below the specific, main benefits of the proposal:
- Provision of older people’s accommodation
 - Social benefits in specialised age-friendly housing
 - Development of previously developed land
 - Development in a sustainable location
 - Release of general housing
 - Landscape enhancements
 - Biodiversity enhancements
 - Job creation and economic benefits
- 6.4 When determining the degree of positive weight to be attached to each of these benefits, I shall apply the following scale: ‘very substantial’, ‘substantial’, ‘significant’, ‘moderate’, ‘negligible’ and ‘neutral’ .
- 6.5 The balancing exercise, weighing the harms against the benefits and other material considerations, is conducted in Section 7.0.

Very Special Circumstances

Provision of older people’s accommodation

- 6.6 Paragraph 60 of the NPPF is clear that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed. Groups with specific housing needs include older people.
- 6.7 Jessamy Venables sets out her own assessment of need on the basis of both the Council's area (South Cambridgeshire) and the market catchment area. Ms Venables concludes in her proof as follows:
- 6.8 There is currently a shortfall of 218 minimum market-standard elderly care home beds in the Council's local authority area. This net need increases to 500 bedspaces in the Council's area when the analysis is based on care bedrooms providing full en-suite wetrooms.
- 6.9 With regards to the need for dedicated dementia care beds, Ms Venables has calculated a net need for 277 minimum market-standard dementia care beds and 288 full market-standard care bedrooms (providing level access wetrooms).
- 6.10 The Housing Needs of Specific Groups report 2021 (Cambridgeshire and West Suffolk) identifies a need for 642 care beds in the Council's area. This is expected to increase to 1,613 care beds by 2030.
- 6.11 While the identified shortfalls of care home beds vary due to the use of need analysis toolkits with different prevalence rates, it is apparent from each of the assessments that the current undersupply needs to be addressed and that the shortfall will continue to increase during the plan period.
- 6.12 Ms Venables makes reference to the Harpenden planning appeal [CD130], which makes the point that the provision of a care home assists in reducing bed-blocking in hospitals, thus enabling the NHS to use beds more effectively and efficiently, with the resultant benefits this has for the wider population. It is very clear that the issue of bed-blocking in the NHS is reaching a critical point given the impact it is having on the delivery of accident and emergency care and the extended waiting times being experienced by ambulance crews.
- 6.13 In his first address of 2023, the Prime Minister outlined his five top priorities which included reducing waiting lists for the NHS so that people can get the care they need more quickly. To achieve this aim the Government are providing funding to discharge people into social care and the community, freeing up beds. While it is intended that the majority of those discharged from the NHS will receive care at home, a proportion will have more complex care needs which can be met better and more cost-effectively within a care home.

- 6.14 In Ms Venables' opinion, the quality of care accommodation is increasingly important to support the care of those with high level nursing and dementia care needs who, now more than ever since the pandemic, require a care home environment with high standards of infection control.
- 6.15 I have explained in Section 4.0 above that the Council's development plan acknowledges that the population of the district is ageing. It should be a matter of common ground that there is a significant need for specialist older people's accommodation within South Cambridgeshire.
- 6.16 Despite this, the Council's development plan does not expressly allocate any land for the provision of specialist older people's accommodation. Nor does the Council's development plan contain any prescriptive policies that require new housing or other developments to provide a minimum proportion of units as specialist accommodation for older people. The development plan is toothless in this regard. The needs of older people are simply not reflected within the planning policies of the development plan.
- 6.17 Furthermore, the Framework (paragraph 60) is clear that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Within this context, the size, type and tenure of housing needed for different groups in the community, including older people, should be assessed and reflected in planning policies.
- 6.18 Paragraph 11(a) of the NPPF requires that plans should positively seek opportunities to meet the development needs of their area.
- 6.19 I have further explained that national planning guidance is unequivocal; the need to provide housing for older people is critical (Paragraph 001, Reference ID: 63-001-20190626).
- 6.20 The Council has previously considered planning application 20/02929/OUT relating to land between Haverhill Road and Hinton Way, Stapleford' for a proposed retirement care village on Green Belt land. The Council refused this application for four reasons, including inappropriate development without meeting the exception criteria, and the failure to demonstrate 'very special circumstances'. The applicant subsequently lodged an appeal against the decision of the Council to refuse planning permission (APP/W0530/W/21/3280395) ("the Stapleford Appeal") [CD113].
- 6.21 The Statement of Common Ground for the Stapleford Appeal records, in paragraphs 6.47 and 6.48, that the Council did not dispute the identified needs for older people's housing and that that scheme would make a 'very significant' contribution to meeting local needs (CD114). The Council's Statement of Case [CD120] in this appeal says the

following: “*There is an identified need for such housing, which form part of the overall need for housing within the district and therefore weight should be given to the delivery of older peoples housing. The Council considers that **very significant weight** should be given to such housing*” [paragraph 5.21] (emphasis added).

- 6.22 The Stapleford Appeal was allowed on 29 December 2021 [CD113]. The Inspector saw ‘no reason to disagree’ with the conclusions drawn by the expert witness on need (paragraphs 41-43), who demonstrated projected shortfalls in the delivery of the need for extra care dwelling units and the need for care home beds. Paragraph 43 of this appeal decision recorded the Council’s Committee Report as having accepted that the development could make a significant contribution towards meeting local needs and that significant weight should be given to this. The Inspector did not disagree either with giving ‘**very significant weight**’ to the contribution made to meeting these local needs (emphasis added).
- 6.23 The reserved matters application has been submitted and whilst the outline application assumed a 50/50 split between extra care and care home, the submitted details show 100% extra care with no care home provision. The reserved matters planning application reference is 22/04303/REM.
- 6.24 In addition to the above, planning permission was granted on appeal for ‘*Redevelopment to form 39 retirement living apartments for older persons including communal facilities, car parking and associated landscaping*’ at No. 2 Station Road, Great Shelford, Cambridge (LPA reference 21/05276/FUL and PINS reference APP/WO530/W/22/3296300) [CD108]. Within the Statement of Common Ground agreed between the appellant and the Council in that case, it was agreed that there was a need for additional specialist older persons accommodation within the Council’s area in view of the rapidly ageing local population, including within the 60-74 and 75+ age brackets (paragraphs 8.2 and 8.3) [CD109].
- 6.25 At paragraph 46 of this decision, the Inspector cited ‘The Older People’s Housing, Care and Support Needs in Greater Cambridge 2017-2036’ report (2017) as evidence of the identified need for older people’s housing in Greater Cambridge (CD121) The Closing Statement by the Council within that appeal acknowledged that ‘**Significant weight should be attached to the need for specialist accommodation for older people**’ (paragraph 89) (CD112). In determining the appeal, the Inspector concluded that ‘significant weight’ should be given to the benefit of the proposal meeting local and national needs (paragraph 46) (CD108) (emphasis added).
- 6.26 Separately, the Council granted planning permission within Capital Park, Fulbourn (which is within the Cambridge Green Belt), for the “*Demolition of the existing Fulbourn social club and construction of a new 72-bedroom care home (Use Class C2) with associated car and cycle parking landscaping and access*, under planning application reference S/3418/17/FL”. The Council’s officers recommended approval and planning permission was then granted by the planning committee. Paragraph 93 of the

Committee Report [CD121] states that *'a significant existing need for care home provision has been identified in the immediate and wider South Cambridgeshire area and that the current projections are of a worsening deficit in the mid and long term. **The need for a care home facility in the area is therefore considered to be significant and a material consideration which should be given significant weight in the planning balance**'* (emphasis added)

6.27 When the development proposed in the current appeal was initially assessed by the Council's officers, the Council, drawing on its knowledge of relevant previous appeals (including Stapleford (20/02929/OUT) and Great Shelford (21/05276/FUL)), acknowledged that great weight should be attached to providing older people's accommodation. Section 10 of the Committee Report acknowledged this, specifically referencing in paragraph 10.33 the Inspector's decision on the Stapleford appeal as well as the statement in the PPG that the *'need to provide housing for older people is critical'*. Officers stated in paragraph 10.15 of the Committee Report that they were satisfied that need for the care facility was appropriately demonstrated [CD91].

6.28 In contrast to these clear expressions of giving very significant weight for this type of provision, the Council seem to be adopting a different approach in this appeal. At paragraph 5.50 of the Statement of Case [CD120], they now say: *"The Council will contextualise the level of need through its evidence at Inquiry and explain the County Council's strategy for addressing that need through prioritizing support for people staying in their own homes, retaining as much independence as possible, and the development of a mixed market with a range of housing options including new models. This context tempers the weight to be given to the need for a care home such as the appeal proposal"*. They do not state what weight is to be attached to the need.

6.29 In my view, there remains a significant unmet need for older people accommodation and **very substantial** weight should be attached to this need.

Social benefits in specialised age friendly housing

6.30 Jessamy Venables explains the social and wellbeing benefits of specialist age-friendly housing. She explains that, for residents with their increasing dependency levels, the accommodation must be fit for purpose and flexible to enable personal and nursing care to be provided effectively and safely. The proposed care home would provide spacious, well-appointed care accommodation with bedrooms providing full en-suite rooms.

6.31 In addition, future residents would receive great safety and support from nursing and care staff available on a 24-hour basis. The proposed dedicated dementia use within the care home would address a significant need for specifically-designed accommodation to meet the needs of these residents. This is addressed in Mr Roe's statement, which is appended in Appendix 4.

- 6.32 As well as the social benefits to residents, the local community would benefit from the provision of the well-equipped care home within their community. This is further expanded upon in paragraph 8.4 of Ms Venables' proof of evidence.
- 6.33 Paragraph: 001 Reference ID: 63-001-20190626 of the PPG is clear that offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.
- 6.34 I attach **substantial** weight to this benefit.

Development of previously developed land

- 6.35 The Framework states at paragraph 120 that decision makers should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs" [para. 120(c)] and that planning should "promote and support the development of under-utilised land and buildings" [para. 120(d)]. Paragraph 124 of the Framework adds that "planning policies and decisions should support development that makes efficient use of land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it".
- 6.36 I attach **substantial** weight to this benefit.

High-quality architecture

- 6.38 The proposed development would provide architecture of the highest quality, taking cues from the appearance of the existing building whilst avoiding some of its less successful elements in design terms. Overall, the result would be a new building that would be significantly superior to the current building in architectural terms.
- 6.39 I attach **very substantial** weight to this benefit.

Development in a sustainable location

- 6.40 The appeal site benefits from a high level of connectivity with local and regional transport networks.
- 6.41 I attach **substantial** weight to this benefit.

Release of general housing

- 6.42 South Cambridgeshire is one of the most unaffordable areas to live in the United Kingdom. The Council's Local Plan acknowledges this in a 'key facts' section (p. 133) [CD100].
- 6.43 Paragraph 7.38 of the Local Plan confirms that the population of the district is ageing and states that, often, older people need or prefer smaller properties that are easier to manage than their original home, with people often looking to 'downsize' to a smaller property.
- 6.44 The provision of purpose-built specialist accommodation for older people will likely lead to the release of market housing in South Cambridgeshire and this is a benefit of the proposal.
- 6.45 In my view the release of market housing is a significant benefit of the appeal proposals and one to which **significant** weight should be attached.

Landscape enhancements

- 6.46 Paragraph 145 of the NPPF advises local planning authorities to plan positively to enhance the beneficial use of Green Belt land, including to enhance landscapes and visual amenity.
- 6.47 The proposed development would deliver enhancements to the character and appearance to the site and to the surrounding area.
- 6.48 The landscape design includes the retention of 62no. trees, the relocation of existing semi-mature trees, the provision of new trees and approximately 1km of new hedgerow and herbaceous planting. The scheme also includes the seeding of 0.43ha of wildflower meadow and the establishment of fruit trees as a small orchard. In addition, nesting boxes, bat/bug boxes and log piles will also be incorporated into the scheme and within the design of the building, two areas of biodiverse roofs comprising pre-sown wildflower mats would be created. These are all encouraged by the Natural Cambridgeshire Local Nature Partnership's 'Developing with Nature' Toolkit.
- 6.49 I consider that the landscape and visual enhancements proposed by the appeal scheme are of merit and that **moderate** weight should be given to this benefit. This should be considered in the context of the evidence of Martina Sechi that no unacceptable landscape or visual harm would arise from the proposals.

Biodiversity enhancements

- 6.50 Paragraph 180(d) of the NPPF states that development which has as its primary objective to conserve or enhance biodiversity should be supported, while opportunities to improve biodiversity in and around developments should be integrated as part of their

design, especially where this can secure measurable net gains for biodiversity (or enhance public access to nature where appropriate).

- 6.51 The Council's Doubling Nature Strategy (2021) [CD119] sets out a vision for the doubling of nature within South Cambridgeshire by 2050. On page 8, the strategy explains that important wildlife habitats in South Cambridgeshire include, amongst other things, woodland, scrub, hedgerows and lowland chalk grasslands.
- 6.52 The development proposal would result in significant Biodiversity Net Gain at the site. This includes a calculated 74.49% net gain in habitats and 38.72% net gain in linear features (for example, hedgerows). Whilst the new Metric 3.1 now applies, the Council's position remains that the biodiversity enhancements should be afforded significant weight (CD 120: para. 5.61, Council's Statement of Case).
- 6.53 It is clear that the ecological enhancements that would be delivered by the development proposals would be significant and long-lasting.
- 6.54 My view is that the biodiversity benefits of the proposal should be given **significant** weight.

Job creation and economic impacts

- 6.55 Chapter 6 of the NPPF focuses on building a strong, competitive economy. Paragraph 81 of the NPPF sets out that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 6.56 The proposed care home is anticipated to generate 92no. full time employees and 11no. part time employees, across a variety of roles. The additional jobs created during demolition and construction, alongside the operations of the care home, would also contribute to the economic benefits that the scheme would deliver.
- 6.57 The creation of new local employment opportunities is a significant benefit of the development proposal and I attach **moderate** weight to this benefit.

Summary

- 6.58 The table below summarises the very special circumstances discussed above and the weight to be applied.

Table 01: Summary of very special circumstances and associated weighting

SUMMARY OF VERY SPECIAL CIRCUMSTANCES	WEIGHT TO BE APPLIED
Provision of Older People's Accommodation	Very Substantial
Social benefits in specialised age friendly housing	Substantial
Development of Previously Developed Land	Substantial
High quality Architecture and Space	Very Substantial
Development in a Sustainable Location	Substantial
Release of General Housing	Significant
Landscape Enhancements	Moderate
Biodiversity Enhancements	Significant
Job Creation and Economic Benefits	Moderate
Cumulative total	Very Substantial

7.0 Overall Planning Balance

- 7.1 With regards to the Green Belt, whilst there would be harm due to the development being 'inappropriate' in policy terms, it is the Appellant's evidence that it would cause no harm to the perceived openness of the Green Belt, nor result in any other harmful landscape or visual impact. The Council takes a different view but not significantly so, contending that the harm to the openness of the Green Belt would be negligible but making no other claim of harm in landscape or visual terms.
- 7.2 The loss of the entire building through demolition would be significant. However, it would amount to a loss of a non-designated heritage asset of low quality.
- 7.3 On the other side of the scales, the benefits of the scheme include: the provision of older people's accommodation to meet the need for such accommodation; the social benefits of specialised age-friendly housing; the reuse of previously-developed land; the delivery of high-quality architecture and space; the development being within a sustainable location; the release of general housing; the enhancements to the landscape; the enhancements to biodiversity; and the creation of jobs and other economic benefits. In my judgment, these benefits would clearly outweigh, by a considerable margin, the harm that would be caused, by the proposal. I reach this conclusion even if the Council's position on harm is preferred.
- 7.4 Accordingly, very special circumstances are deemed to exist, and in this context allowing the appeal accords with both statutory development plan and with national planning policy.
- 7.5 In my opinion, the determination that would be in accordance with development plan would be to allow the appeal. The material considerations do not indicate otherwise but instead give even greater weight to the arguments in favour of allowing the appeal. If contrary to my evidence the Inspector does not consider the appeal scheme is in accordance with the development plan when read as a whole, then the material considerations, particularly the very great benefits, indicate that planning permission should be granted nonetheless.

8.0 Reasons for Refusal

8.1 The Council's reasons for refusing permission were as follows:

1) The site is located outside of the development framework boundary of Girton, within the countryside and Cambridge Green Belt. The proposed development would represent inappropriate development that is, by definition, harmful to the Green Belt in policy terms as the development does not fall within any of the exception criteria within paragraphs 149 or 150 of the National Planning Policy Framework 2021. The proposal is therefore contrary to Policy S/4 of the South Cambridgeshire Local Plan 2018 and paragraphs 147, 148, 149 and 150 of the National Planning Policy Framework 2021 that seek to resist inappropriate development in the Green Belt.

2) In addition to harm caused by inappropriateness, the proposed development would result in the loss of a non-designated heritage asset to the detriment of the character and appearance of the area. In taking a balanced judgement, the loss of the non-designated heritage asset is considered to cause substantial harm as it would fail to sustain or enhance the significance of the asset and the overall benefits of the scheme are not considered to outweigh the harm identified. The proposal is therefore contrary to paragraph 203 of the National Planning Policy Framework 2021 and policy NH/14 of the South Cambridgeshire Local Plan 2018.

3) The application has failed to provide very special circumstance including the need for specialist housing which, taken individually or collectively, demonstrate why the harm by reasons of inappropriateness in the Green Belt and other harm identified, being the loss of the non-designated heritage asset, is clearly outweighed by these considerations. The application therefore fails to satisfy the requirements of paragraphs 147 and 148 of the National Planning Policy Framework 2021.

8.2 Drawing on my assessment (above) of the development plan, the harm, the benefits of the proposal and other material considerations, I find all three reasons of refusal to be unfounded. In my judgment, the proposal is in accordance with the development plan and the Framework.

9.0 Third Party Comments

- 9.1 This section outlines the comments received from third parties on the application. 95 representations have been received from the public: 62 objected and 33 were in support.

- 9.2 Appendix 2.0 sets out the full set of comments received from statutory consultees and my response to them. Appendix 3.0 sets out the full set of objection comments received from all other third parties, such as local residents, and my response to them.

10.0 Overall conclusions and summary proof of evidence

- 10.1 The appeal proposal is a sensitive scheme that fully respects its Green Belt setting. It is designed by Carless Adams, a leading architectural firm in the care sector. The proposal would provide class-leading facilities and fully respond to the challenges presented by the Covid-19 pandemic. The highest level of care will be provided by the operator.
- 10.2 National planning policy (paragraph 60 of the NPPF) is clear that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Within this context, the size, type and tenure of housing needed for different groups in the community, including older people, should be assessed and reflected in planning policies.
- 10.3 The national PPG is unequivocal: the need to provide housing for older people is critical (Paragraph: 001 Reference ID: 63-001-20190626). Notwithstanding this clear guidance, the Council's Local Plan does not expressly allocate any land for the provision of specialist older people's accommodation. Nor does the Council's development plan contain any prescriptive policies that require new housing or other developments to provide a minimum proportion of units as specialist accommodation for older people. The Local Plan is toothless in this regard.
- 10.4 The officer in recommending approval highlighted the need for accommodation for older people. In addition, in two appeals in the last 12 months the Council has accepted that the need is very great. This agreement was reached whilst extensive discussions were held with the Council in December 2021 about the need for the proposal, and more surprisingly, as the Committee considered the application in June, the Council were agreeing at the appeal at Station Road (reference: APP/W0530/W/22/3296300) that the need was very significant.
- 10.5 There is currently a shortfall of 218 minimum market-standard elderly care home beds in the Council's local authority area. This net need increases to 500 bedspaces in the Council's area when the analysis is based on care bedrooms providing full en-suite wetrooms.
- 10.6 With regards to the need for dedicated dementia care beds, Jessamy Venables has calculated a net need for 277 minimum market-standard dementia care beds and 288 full market-standard care bedrooms (providing level access wetrooms).

- 10.7 The issue of bed-blocking has become critical within the NHS. The provision of a care home assists in reducing bed-blocking, thus enabling the NHS to use beds more effectively and efficiently, with the resultant benefits this has for the wider population
- 10.8 The quality of care accommodation is increasingly important to support the care of those with high level nursing and dementia care needs who, now more than ever since the pandemic, require a care home environment with high standards of infection control.
- 10.9 The reasons for refusal are unusual in failing to identify the level of harm to the Green Belt. This is not surprising as the building replaces an existing building and great care has been taken in the design to reduce any impact on the green belt. The Council's landscape officer acknowledged this and said the impact on the openness of the Green Belt is negligible (CD76) and actually improved with the reduction in surface car parking. Martina Sechi in her evidence concludes that the appeal proposal has no impact at all on the openness of the Green Belt, or impact on the landscape or other visual properties of this location.
- 10.10 Many of the third-party comments concerned the loss of the heritage building. The building is not listed nor does it sit within a Conservation Area so no statutory tests apply to its loss. It currently benefits from a 'Certificate of immunity from listing' to which weight must be given. I accept the building is a non-designated heritage asset but it is of low significance and its loss must be considered in the overall planning balance
- 10.11 I accept that the development is, by definition, not appropriate development in the Green Belt and that for permission to be granted, very special circumstances have to be demonstrated. I have set out the many benefits of the appeal and set this against the harm to the openness and appearance to the Green Belt. The Appellant's evidence (which I endorse) is that the proposal would result in no harm to the openness or visual qualities of the Green Belt, resulting in the benefits of the proposal outweighing the definitional harm that exists, and by a significant margin. The Council take a different view on harm but not significantly so. They say the impact on the Green Belt openness is negligible with no other harm identified. Even if that conclusion were preferred by the Inspector, I would still conclude that the benefits would outweigh any harm and (again) by a considerable margin. I have also considered the harm that would be caused by the loss of the non-designated heritage asset. Again, I have concluded that the benefits of the proposal outweigh any harm, by a considerable margin.
- 10.12 The appeal proposal is in accordance with paragraph 148 of the Framework and therefore policy S/4 of the Development Plan. In my judgment, the determination that would be in accordance with the development plan would be to allow the appeal. Material consideration do not indicate otherwise but instead give even greater weight to the arguments in favour of allowing the appeal

APPENDIX 1

POLICY REVIEW: SOUTH CAMBRIDGESHIRE LOCAL PLAN (2018)

POLICY	RESPONSE
S/1 'Vision'	The scheme accords with the Local Plan's Vision.
S/2: Objectives of the Local Plan	The appeal scheme would support the six objectives outlined under Policy S/2; with the 'inappropriate development' applied with Very Special Circumstances.
S/3: Presumption in Favour of Sustainable Development	The appeal scheme represents a highly sustainable scheme that would serve to provide social, economic and environmental benefits.
S/4: Cambridge Green Belt	Considered throughout evidence. The appeal scheme, although 'inappropriate development' would be in accordance with this policy.
S/5: Provision of New Jobs and Homes	The scheme would provide specialist care support staff, whilst serving to provide older people's accommodation.
S/6: The Development Strategy to 2031	The scheme is sustainability located to serve the care needs of older people and the accommodation that they require.
S/7: Development Frameworks	The site is outside, but adjacent to, the settlement boundary of Girton and Cambridge. Although in the open countryside, the redevelopment of previously developed land within the Green Belt (subject to Very Special Circumstances) can occur outside Development Frameworks.
S/8: Rural Centres	Not relevant to the appeal scheme.
S/9: Minor Rural Centres	The settlement Girton is a Minor Rural Centre. The site is situated outside the development framework (settlement boundary) that serves Girton.
S/10: Group Villages	Not relevant to the appeal scheme.
S/11: Infill Villages	Not relevant to the appeal scheme.
S/12: Phasing, Delivery and Monitoring	Not relevant to the appeal scheme.
S/13: Review of the Local Plan	The emerging Local Plan is not due to be adopted until 2026.
SS/1: Orchard Park	Not relevant to the appeal scheme.
SS/2: Land between Huntingdon Road and Histon Road	Not relevant to the appeal scheme.
SS/3: Cambridge East	Not relevant to the appeal scheme.

SS/4: Cambridge Northern Fringe East and Cambridge North railway station	Not relevant to the appeal scheme.
SS/5: Northstowe Extension	Not relevant to the appeal scheme.
SS/6: Waterbeach New Town	Not relevant to the appeal scheme.
SS/7: New Village at Bourn Airfield	Not relevant to the appeal scheme.
SS/8: Cambourne West	Not relevant to the appeal scheme.
CC/1: Mitigation and Adaptation to Climate Change	Considered in submission and evidence.
CC/2: Renewable and Low Carbon Energy Generation	Considered in submission and evidence.
CC/3: Renewable and Low Carbon Energy in New Developments	Considered in submission and evidence.
CC/4: Water Efficiency	Considered in submission and evidence.
CC/5: Sustainable Show Homes	Not relevant to the appeal scheme.
CC/6: Construction Methods	Considered in submission and evidence.
CC/7: Water Quality	Considered in submission and evidence.
CC/8: Sustainable Drainage Systems	Considered in submission and evidence.
CC/9: Managing Flood Risk	Considered in submission and evidence.
HQ/1: Design Principles	Considered throughout evidence. The scheme is of a high-quality design.
HQ/2: Public Art and New Development	Not relevant to the appeal scheme.
NH/1: Conservation Area and Green Separation at Longstanton	Not relevant to the appeal scheme.
NH/2: Protecting and Enhancing Landscape Character	Considered in evidence.
NH/3: Protecting Agricultural Land	Not relevant to the appeal scheme.
NH/4: Biodiversity	Considered in evidence.
NH/5: Sites of Biodiversity or Geological Importance	Not relevant to the appeal scheme.
NH/6: Green Infrastructure	Not relevant to the appeal scheme.
NH/7: Ancient Woodlands and Veteran Trees	Considered in evidence.
NH/8: Mitigating the Impact of Development in and adjoining the Green Belt	Considered in evidence.
NH/9: Redevelopment of Previously Developed Sites and Infilling in the Green Belt	Considered in evidence.
NH/10: Facilities for Recreation in the Green Belt	Not relevant to the appeal scheme.
NH/11: Protected Village Amenity Areas	Not relevant to the appeal scheme.

NH/12: Local Green Space	Not relevant to the appeal scheme.
NH/13: Important Countryside Frontage	Not relevant to the appeal scheme.
NH/14: Heritage Assets	Considered in evidence.
NH/15: Heritage Assets and Adapting to Climate Change	Not relevant to the appeal scheme given that the existing building would be demolished.
H/1: Allocations for Residential Development at Villages	Not relevant to the appeal scheme.
H/2: Bayer CropScience Site, Hauxton	Not relevant to the appeal scheme.
H/3: Fulbourn and Ida Darwin Hospitals	Not relevant to the appeal scheme.
H/4: Papworth Everard West Central	Not relevant to the appeal scheme.
H/5: Fen Drayton Former Land Settlement Association Estate	Not relevant to the appeal scheme.
H/6: South of A1307, Linton	Not relevant to the appeal scheme.
H/7: Residential Moorings	Not relevant to the appeal scheme.
H/8: Housing Density	Not relevant to the appeal scheme.
H/9: Housing Mix	Considered in evidence.
H/10: Affordable Housing	Not relevant to the appeal scheme.
H/11: Rural Exception Site Affordable Housing	Not relevant to the appeal scheme.
H/12: Residential Space Standards	These standards are written to advise on residential dwellinghouses. These are not relevant to the appeal scheme, but for the avoidance of doubt, the scheme is of high-quality space that were acceptably serve future occupiers.
H/13: Extensions to Dwellings in the Countryside	Not relevant to the appeal scheme.
H/14: Replacement Dwellings in the Countryside	Not relevant to the appeal scheme.
H/15: Countryside Dwellings of Exceptional Quality	Not relevant to the appeal scheme.
H/16: Development of Residential Gardens	Not relevant to the appeal scheme.
H/17: Re-use of Buildings in the Countryside for Residential Use	Not relevant to the appeal scheme.
H/18: Working at Home	Not relevant to the appeal scheme.
H/19: Dwellings to Support a Rural-based Enterprise	Not relevant to the appeal scheme.
H/20: Provision for Gypsies and Travellers and Travelling Showpeople	Not relevant to the appeal scheme.
H/21: Gypsy and Traveller Provision at New Communities	Not relevant to the appeal scheme.

H/22: Proposals for Gypsies, Travellers and Travelling Showpeople; Sites on Unallocated Land Outside Development Frameworks	Not relevant to the appeal scheme.
H/23: Design of Gypsy and Traveller Sites, and Travelling Showpeople Sites	Not relevant to the appeal scheme.
E/1: New Employment Provision near Cambridge – Cambridge Science Park	Not relevant to the appeal scheme.
E/2: Cambridge Biomedical Campus Extension	Not relevant to the appeal scheme.
E/3: Fulbourn Road East (Fulbourn) 6.9 hectares	Not relevant to the appeal scheme.
E/4: Allocations for Class B1 Employment Uses	Not relevant to the appeal scheme.
E/5: Allocations for Class B1, B2 and B8 Employment Uses	Not relevant to the appeal scheme.
E/6: Papworth Hospital	Not relevant to the appeal scheme.
E/7: Imperial War Museum at Duxford	Not relevant to the appeal scheme.
E/8: Mixed-use development in Histon & Impington Station Area	Not relevant to the appeal scheme.
E/9: Promotion of Clusters	Not relevant to the appeal scheme.
E/10: Shared Social Spaces in Employment Areas	Not relevant to the appeal scheme.
E/11: Large Scale Warehousing and Distribution Centres	Not relevant to the appeal scheme.
E/12: New Employment Development in Villages	Not relevant to the appeal scheme.
E/13: New Employment Development on the Edges of Villages	Not relevant to the appeal scheme.
E/14: Loss of Employment Land to Non-Employment Uses	Not relevant to the appeal scheme.
E/15: Established Employment Areas	Not relevant to the appeal scheme.
E/16: Expansion of Existing Businesses in the Countryside	Not relevant to the appeal scheme.
E/17: Conversion or Replacement of Rural Buildings for Employment	Not relevant to the appeal scheme.
E/18: Farm Diversification	Not relevant to the appeal scheme.
E/19: Tourist Facilities and Visitor Attractions	Not relevant to the appeal scheme.
E/20: Tourist Accommodation	Not relevant to the appeal scheme.
E/21: Retail Hierarchy	Not relevant to the appeal scheme.
E/22: Applications for New Retail Development	Not relevant to the appeal scheme.
E/23: Retailing in the Countryside	Not relevant to the appeal scheme.

SC/1: Allocation for Open Space	Not relevant to the appeal scheme.
SC/2: Health Impact Assessment	The scheme was supported by a Health Impact Assessment, which the Council's Health Development Officer has assessed as Grade A, which the scheme is in accordance with this policy.
SC/3: Protection of Village Services and Facilities	Not relevant to the appeal scheme.
SC/4: Meeting Community Needs	Provision for burial spaces would be captured via a planning obligation and the provision of a care home would aid to serve the needs of older persons within the wider area.
SC/5: Community Healthcare Provision	Not relevant to the appeal scheme.
SC/6: Indoor Community Facilities	Not relevant to the appeal scheme.
SC/7: Outdoor Play Space, Informal Open Space and New Developments	Not relevant to the appeal scheme.
SC/8: Protection of Existing Recreation Areas, Allotments and Community Orchards	Not relevant to the appeal scheme.
SC/9: Lighting Proposals	Landscape lighting details have been assessed by the Council's Environmental Health Officer and Wildlife Officer. Both raise no objection, subject to planning conditions to deal with additional matters.
SC/10: Noise Pollution	Acoustic details have been assessed by the Council's Environmental Health Officer, who has raised no objections to the appeal scheme, subject to planning conditions.
SC/11: Contaminated Land	Contamination reports (both original and revised) were submitted for assessment. The Planning Case Officer and Environmental Health Officer raised no objection to the revisions, subject to compliance of planning conditions 9, 10 and 11 as set out in the Committee Report with the recommendation for approval. The proposal accords with this policy.
SC/12: Air Quality	There is no adverse impact to air quality from the scheme.
SC/13: Hazardous Installations	Not relevant to the appeal scheme.
SC/14: Odour and Other Fugitive Emissions to Air	Odour has been catered for, as demonstrated through the Ventilation Statement [CD29]. The scheme accords with this policy.

TI/1: Chesterton Rail Station and Interchange	Not relevant to the appeal scheme.
TI/2: Planning for Sustainable Travel	Cambridge County Council's Local Highway Authority and Transport Assessment team raised no objections to the scheme, but they requested a Travel Plan be captured by way of a planning condition (Condition 23).
TI/3: Parking Provision	The vehicular and cycle parking spaces proposed are considered to be acceptable by Officers
TI/4: Rail Freight and Interchanges	Not relevant to the appeal scheme.
TI/5: Aviation-Related Development Proposals	Not relevant to the appeal scheme.
TI/6: Cambridge Airport Public Safety Zone	The proposed building and use would fall far below the requirements that would impact upon the public safety zone that serves Cambridge Airport.
TI/7: Lord's Bridge Radio Telescope	Not relevant to the appeal scheme.
TI/8: Infrastructure and New Developments	The provision of a planning obligation to capture a financial contribution for burial spaces was considered to be acceptable by the Planning Case Officer and S106 Planning Obligations Officer, in accordance with this policy.
TI/9: Education facilities	Not relevant to the appeal scheme.
TI/10: Broadband	Considered in evidence.

APPENDIX 2

THIRD PARTY COMMENTS (STATUTORY CONSULTEES)

CONSULTEE	SUMMARY	DATE	MY RESPONSE
Public Health England	No stance: Not a statutory consultee so we would not normally comment on this type of planning application unless there are specific chemical & environmental hazard concerns which have the potential to impact on the health of local communities. Impacts on public health from local air quality, noise and contaminated land fall under the remit of the local authority and it is their responsibility to decide whether or not to comment on these aspects of the planning application.	12 April 2021	Conditions on local contamination and lighting were captured as suggested planning conditions within the Committee Report.
Natural England	No comments.	16 April 2021	No comment.
Local Highway Authority	Given the size and nature of the proposed development Transport Assessment Team within the County Council should be consulted on this application.	20 April 2021	This comments were later sought and received on 16 August 2021.
Designing Out Crime Officer	Supportive and no further comments to make: Comments in regard to safety made within the Design and Access Statements support that these areas should be addressed with what is proposed including the external lighting plan.	22 April 2021	No comment.
Contaminated Land Officer	Phase 1 Investigation report received. Awaiting Phase 2 report. If not provided, secure full contamination condition minus Part 1(a) (Detailed desk study).	27 April 2021	Revised comments were received on 11 July 2022, with conditions suggested.
Environmental Health Officer	No objections subject to conditions/informative on construction hours and air source heat pumps.	28 April 2021	Construction hours are captured as part of the requirements of Condition 13 (Construction Environmental Management Plan). Condition 25 sets out the implementation of the low carbon / renewable energy technologies as approved under the Energy Strategy Report (Revision P2).

<p>Environment Agency</p>	<p>No objection in principle. The Applicant must demonstrate that the land is uncontaminated for infiltration drainage (including soakaways).</p>	<p>28 April 2021</p>	<p>This was the only comment received by the Environment Agency. Matters of contamination and infiltration drainage were resolved through assessment by the Council's Environmental Health team and the Lead Local Flood Authority.</p>
<p>Anglian Water</p>	<p>Developer to contact Anglian Water to connect to Foul Drainage network. With regards to Surface Water drainage, it is noted that the strategy seeks to connect to private drainage. If the Applicant seeks Anglian Water adopted, contact must be made.</p>	<p>29 April 2021</p>	<p>No comments to make.</p>
<p>The Victorian Society</p>	<p>Object:</p> <ul style="list-style-type: none"> This building should be viewed as a non-designated heritage asset by the local authority. Consequently paragraph 197 should apply which requires "<i>a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset</i>". <p>Adequate explanation has been not provided to justify this demolition.</p>	<p>29 April 2021</p>	<p>The building is a non-designated heritage asset, but its significance is low. When balanced against paragraph 203 in terms of its loss, as demonstrated in my evidence, the loss of this building would be of a low level of significance.</p>
<p>Ecology Officer</p>	<p>No objections: Advised imposing a condition to carry out the development in accordance with Ecological Assessment.</p>	<p>30 April 2021</p>	<p>No comments to add and matter captured under Condition 15 within the Committee Report.</p>
<p>Cambridgeshire County Council – Transport</p>	<p>Further to review of the Transport Statement, it is anticipated that the proposed development would result in a net reduction of 70 daily vehicle movements, including a reduction of 10 movements during AM peak hour and 12 movements during PM peak hour.</p> <p>Further details needed on multi modal trip generation and on the nearest bus stops. Upgrading these stops may be required as potential mitigation again. A travel plan will be required with any permission granted.</p>	<p>30 April 2021</p>	<p>Further to revisions and clarifications, Cambridgeshire County Council – Transport advised on 16 August 2021 and they had no objections to the scheme. A Travel Plan is captured under Condition 23 of the Committee Report where Officer's recommended approval of the scheme.</p>

Highways England	No objections.	30 April 2021	No comments to add.
SCDC Drainage Engineer	No stance: The assessment of flood risk appears incomplete. It requires an assessment of flood risk from all sources of flooding (fluvial flood risk, mapped surface water, flood risk associated with potential overland flows from steep ground, groundwater flood risk etc).	4 May 2021	This was the only comment by the SCDC Drainage Engineer. The Lead Local Flood Authority (Cambridge County Council) also commented on the proposal and, further to revisions, advised on 5 July 2021 that they had no objections.
Greater Cambs Sustainability Officer	No objection: The scheme is supported from a sustainable construction point of view, but further information will be needed if permission is granted, including: i) Detailed design stage SAP calculations to evidence the carbon emission reductions achieved; ii) Technical detailed of the solar PV systems; iii) Site Plan to show where these would be located; and iv) detailed of a maintenance programme to ensure the systems achieve the suggested efficiencies.	4 May 2021	No objections received. Further information was provided and reviewed by the Greater Cambs Sustainability Officer on: 25 May 2021 and 24 June 2021.
Cambridgeshire County Council - LLFA	Objection: Objections in relation to Treatment of Water; submission of FSR rainfall data rather than FEH rainfall data; No confirmation that historic surface water sewer still exists, to drain surface water into network; and iv) further details on calculations of volume of attenuation.	5 May 2021	Further to revised plans, the Lead Local Flood Authority removed their objection on comments dated 5 July 2021.
Ancient Monuments Society	Object: <ul style="list-style-type: none"> Disappointment that heritage concerns have been dismissed with regards to the complete loss of a historic Victorian Building. There is no clear justification why the house could not be adapted for staff accommodation, facilities, offices, etc. The priority for development within the District should be to adapt and reuse historic buildings, rather than demolish high quality, viable buildings.	5 May 2021	Heritage concerns have not been dismissed. The significance of the building has been evaluated. Whilst the loss of the building would be significant, the significance of that loss is very low.

<p>Girton Parish Council</p>	<p>Objection: i) Girton is already well-provided with facilities for this age demographic. There will not be adequate medical and burial services to support another 80-bed care and dementia facility. The proposal will merely skew the village's age demographic further towards the elderly, especially at the luxury and most expensive end of the market.</p> <p>ii) If Officers are minded to accept, contributions towards medical and burial services would be required.</p> <p>iii) The existing building is structurally sound. The resultant damage to the environment and the Girton Gap would be considerable.</p> <p>iv) We object to the LPA's failure to list the building.</p> <p>v) Inadequate parking for staff, who would not be able to use public transport if they are working shifts.</p>	<p>5 May 2021</p>	<p>i) Our assessment demonstrates that there is a need for older people's accommodation across South Cambridgeshire. This is expanded further in Jessyamy Venables Proof of Evidence on 'need'.</p> <p>ii) The Appellant is agreeable to a planning obligation being agreed to cover Burial Services, as per the S106 Planning Obligations Officer's recommendation.</p> <p>iii) The building is not structurally sound, either to be used as a care home or re-used as a hotel.</p> <p>iv) No comment.</p> <p>v) The provisions proposed, plus the condition to secure a travel plan, were acceptable to Cambridgeshire County Council, who raised no objections.</p>
<p>SCDC Tree Officer</p>	<p>No arboricultural or hedgerow objections. Further information required to determination.</p>	<p>6 May 2021</p>	<p>The addition works are captured under Condition 5 (detailed AMS), Condition 6 (site meeting), Condition 7 (Implementation of methodology) and Condition 8 (replacement of trees that are removed, uprooted, destroyed or</p>

			which dies within 5 years of scheme completion).
Greater Cambs Sustainability Officer	<p>Supportive of fabric first approach to development. More clarification needed from energy strategy on renewable or low/zero carbon technology and accurate BER. Unsure currently on compliance with CC/3.</p> <p>Large number of single aspect dwellings proposed are prone to overheating. Strongly recommends overheating analysis be undertaken.</p> <p>Water consumption of 105.85 litres/person/day is policy compliant. Water efficiency strategy to be conditioned if application is approved.</p> <p>A detailed CMP must be submitted and approved by the local authority detailing measures to limit demolition waste to landfill and ensure new structure is low in embodied carbon.</p>	25 May 2021	No objections received. Further information was provided and reviewed by the Greater Cambs Sustainability Officer on 24 June 2021.
Cambridgeshire County Council - LLFA	<p>Objection: Further information required about proposed outfall. No information about surface water network has been provided. Until information provided unable to support the application.</p>	28 May 2021	Further to revised plans, the Lead Local Flood Authority removed their objection on comments dated 5 July 2021.
Greater Cambs Landscape Officer	<p>Findings of the Landscape and Visual Appraisal are generally acceptable. Impact to the Green Belt is negligible.</p> <p>The Landscape Officer has significant concerns over intention to move existing semi-mature trees. The Atlas Cedar being the most vulnerable should be retained and developed into the landscape scheme. Confirmation of methods and phasing to be submitted.</p> <p>The Officer advises that pressure arising from a symmetrical building and garden design on western end creates a desire to relocate trees, but feels that this is not strong enough reason for moving trees. Garden design should react to context and</p>	21 June 2021	<p>The Landscape and Visual Impacts of the proposal are covered in further details within Martina Sechi's Proof of Evidence. We both agree that the impact is negligible.</p> <p>Both the Case Officer and Tree Officer raised no objections to this matter. Notwithstanding this, Conditions 18 and 19 require details of soft landscaping, which further inform this scheme.</p>

	<p>constraints of the environment. Require review of the proposed landscape with this consideration in mind.</p> <p>Support application aside from intention to relocate trees. Redesign of the gardens and retention of more trees must be reviewed and submitted through an amendment.</p>		
Greater Cambs Sustainability Officer	<p>Support application with conditions.</p> <p>i) Carbon emission – approved renewable/low carbon energy technologies will be fully installed and operational prior to occupation.</p> <p>ii) Water efficiency – no dwellings shall be occupied into a water efficiency specification for the proposed development has been submitted and approved.</p>	24 June 2021	No comments to add.
Greater Cambs Conservation Officer	<p>Hotel Felix can be categorized as an NDHA. Maintaining the Girton Gap is important in terms of evolution of both settlements.</p> <p>The fifth design concept has conservation merit.</p> <p>The proposals will not comply with policy NH/14. Scheme fails to sustain and enhance the significance of the NDHA. Should the application gain consent, the usual conditions relating to external materials and detailing would be necessary.</p>	2 July 2021	Considered in my proof of evidence. We accept that the Hotel Felix is a non-designated heritage asset. However, the loss of this extensively altered building would be of a low level of significance.
Cambridgeshire County Council - LLFA	<p>Removal of objection: Supporting documents show that surface water can discharge via the existing outfall pipe to the watercourse to the east. LLFA is supportive of the use of permeable paving as controls surface water and provides water quality treatment. Conditions recommended.</p>	5 July 2021	No comments to add.
SCDC Health Development Officer	<p>The Health Impact Assessment (date of review 19 May 2021) provides an overall grade A of the submitted HIA for this scheme.</p>	19 July 2021	No comments to add.

Cambridgeshire County Council - Archaeologist	No objections.	3 August 2021	No comments to add.
Cambridgeshire County Council – Transport	No objections: Further to the additional information provided, the proposed use would not have a detrimental impact upon the public highway. A travel plan will be required.	16 August 2021	No comments to add, beyond that the Travel Plan required is captured under Condition 23 of the Committee Report.
Cambridgeshire County Council – Commissioning Manager - Adults	<p>The following observations are made:</p> <p>i) The County Council has been finalising needs assessment for accommodation-based services for older people which it expects to publish in the next few months. In its assessment of accommodation-based provision for older people, it has taken account of the Laing Buisson research which has noted that care home market capacity has remained largely flat over the past ten years, even though the numbers of older people has increased significantly. During the same period there has been substantial growth in ‘housing with care’ options. Projecting forwards, Laing Buisson’s analysis suggests that care home growth would be between 4 – 23% above the existing provision. In its forecast, the county council has used the mid-point i.e. 13.5% which equates to an additional 731 beds across Cambridgeshire & Peterborough.</p> <p>ii) According to CQC Care Directory, in April 2020 there were 928 care beds in South Cambridgeshire and 697 beds in Cambridge City. Using the mid-point as the basis of its projections, the County Council’s needs assessment is that by 2036 1,052 care beds will be required in South Cambs and 791 in Cambridge City. So, the expected need would be an additional 124 beds in South Cambs and 94 beds in Cambridge City.</p> <p>iii) The County Council also noted that planning permission had been granted for a further 3 care homes with a total of 210 care beds.</p>	22 December 2021	Matters relating to ‘Need’ have been considered through my evidence.

<p>Greater Cambs – Housing</p>	<p>Whilst we acknowledge that projections show that there will be an increase in the older population and that we need to plan for this need, the information from the County Council shows that there is sufficient provision and pipeline provision to meet this need.</p>	<p>23 December 2021</p>	<p>Throughout my evidence, plus the separate Proof of Evidence on ‘Need’, plus very recent appeal decisions, we demonstrate that the need for older people’s accommodation is not being sufficiently met by South Cambridgeshire District Council.</p>
<p>Greater Cambs Conservation Officer</p>	<p>Main issues highlighted in original response are still of concern and conclusion remains the same. Proposals will result in total loss of the heritage asset.</p>	<p>7 February 2022</p>	<p>As demonstrated through my evidence, whilst the loss of the building would be significant, the significance of the building’s loss would be very low.</p>
<p>NHS Cambridgeshire and Peterborough Clinical Commissioning Group (“CCG”)</p>	<p>There aren’t really any other Practices nearby that care home patients would likely attend. The site is pretty equidistant between Huntingdon Road main site and its branch surgery in Girton.</p> <p>The other nearest surgeries - Arbury Road and Red House - are both over 2 miles away by road and only Red House is on a main public transport route, but Red House probably ranks the highest across our entire footprint in terms of lack of space. They have a net internal area of 550 sqm which should serve a maximum weighted patient list size of 8020 but their weighted list size is 17,500.</p> <p>The next nearest Practices are all city centre Practices (nearly 3 miles by road) or Firs House surgery in Histon is 4 miles away but they have zero capacity and also rank highest across our entire footprint for percentage of patients over 65 and serve multiple care homes already.</p> <p>Re Darwin Green and Eddington, the CCG and STP are yet to make a decision on</p>	<p>8 June 2022</p>	<p>Matters relating to ‘Need’ have been considered through my evidence. A consultation space is included within the proposed floor layout of the new building.</p>

	<p>what services are to be provided from these sites but, regardless, the healthcare estate will be required to serve the large populations emanating from these developments and there will not be additional capacity in the long term to serve additional patients from outside of these areas. It is likely that the services on offer at Eddington and Darwin Green will be appropriate for the needs of the new developments and demographics of those who live there and so it is perhaps likely that Primary care provision will be co-located with community services such as mental health, maternity services, children's services etc.</p>		
PPSE	<p>The County Council have found a much lower level of need than two studies undertaken. County Council estimates led by proposed change to their commissioning strategy.</p> <p>The County Council project need, for an additional 124 bedspaces to 2036 but consider that as there has already been 210 permitted there is no further need.</p> <p>Councils have requested further information from the county council to better understand how their estimates relate to the GL Hearn study.</p>	17 June 2022	Further information was provided throughout the application stage, plus post decision, through the appeal process.
SCDC S106 Officer	<p>Planning obligations are sought in relation to burial provision (£16,800) and monitoring fee (£500)</p>	27 June 2022	The draft Heads of Terms are included within the Statement of Common Ground. Processes to produce the S106 agreement has begun.
Contaminated Land Officer	<p>No objection subject to standard full contamination condition being applied, minus Part 1a (Detailed desk study).</p>	11 July 2022	A planning condition to deal with 'contamination' was captured under conditions 9 (Investigations and mitigations against contamination), 10 (Verification Report) and 11 (unsuspected

			contamination) of the Committee Report.
Cambs Fire and Rescue	Provision of Fire Hydrants either by planning condition or through S106 agreement.	3 November 2022	The comment is dated 3 rd November 2022 and it was published long after the refusal decision was issued. This however is captured under Condition 35 of the Committee Report.
Interested Parties: Comments received following notification of appeal.			
Girton Parish Council	Our Planning Committee met yesterday 09/11/2022 to: 1. Note the Appeal 2. Confirm that their original objection stands given there appear no substantial changes to the original application.	Received 20 December 2022	Comments considered as above (see 5 May 2021).
National Highways	On the 30 April 2021, we returned a no objection to the application. Following a review of the information provided, we concluded that due to the nature and location of the proposed development, it is considered unlikely to be any adverse effect upon the Strategic Road Network. We therefore have no further comment to make as part of the appeal process.	3 November 2022	No comment.

APPENDIX 3

THIRD PARTY COMMENTS

ID	ADDRESS	COMMENT	DATE	RESPONSE
1	84 Arbury Road Cambridge CB4 2JE	<p>You can't seriously knock down yet another wonderful building in Cambridge. So many allowed to go through our planning department and demolish rather than restore?!!! Why? It's ruining the historic City of Cambridge. Who allows these decisions to go ahead? It's crazy. Cambridge town has lost so much character over the years and is slowly becoming Lego town. It's most upsetting. There will be no historic Cambs left soon. Keep the character alive!</p>	04.09.2021	<p>The VSCs from the proposal outweigh the harm from the demolition of the non-designated heritage asset (of low significance).</p>
2	59 Cavendish Road Hornsey London N4 1RR	<p>The Victorian part of the Hotel Felix is a distinctive, appealing and locally scarce historic building, which I was pleased to include in the revised Pevsner Architectural Guides volume for Cambridgeshire (2014). It is in good repair and has enormous potential for reuse. It should not be demolished.</p> <p>In addition, the demolition of the entire hotel complex, some of it less than twenty years old, would be extremely wasteful of resources, and contrary to SCDC's commendable policy of reducing carbon emissions by half by the year 2030. That target cannot be achieved by 'business as usual'. There must be a change in planning policy which fosters the wise reuse of existing buildings. This application is therefore a test case.</p>	15.06.2021	<p>The building is not in good repair and would not be available to operate as a care home or even re-open as a hotel.</p> <p>This comment references the more modern extensions to the building that have impacted upon its heritage status over time.</p> <p>It is more sustainable, as demonstrated in the proposal, to demolish this building (of low significance) and re-build of improved sustainability.</p>

3	74 Blinco Grove, Cambridge, Cambridgeshire, CB1 7TS	<p>I am getting worried that outside the colleges the heritage of Cambridge is not being protected and has been whitewashed into this bland utilitarian place, where building's are knocked up for a few years, never admired and quickly forgotten. Sadly that is going to be the council's legacy.</p> <p>If you are to turn this building into a residential home, surely it would be better to use what you can to make it special for those who have chosen to end their days in this peaceful spot. Granted it may cost as much to put in all the necessary adaptations but would be a better place and experience for all</p>	09.06.2021	<p>The existing building is not to standard to operate as a care home.</p> <p>The proposed care home is of high-quality design that seeks to consider the existing building's character, as well as to serve the care needs of future occupiers.</p>
4	2, The Garden House Napier Place London W14 8LG	<p>The Victorian Society has featured the property and I note that there is an application to demolish the former Hotel Felix.</p> <p>It would be a great loss to witness the demolition of this attractive Victorian building when it could have its use transformed and its purpose changed from hotel to care home.</p> <p>We should show greater respect to Victorian buildings that could continue to serve, saving in the process the willful destruction of a building that has merit, character and architectural harmony. They are part of our heritage.</p>	08.06.2021	The impact of the loss of the building has been considered in my evidence, especially in relation to heritage matters.
5	48 Girton Road Girton Cambridge Cambridgeshire CB3 0LL	I object to this application as the demolition of this beautiful Victorian building will be a significant loss to the local area. I understand that although not listed, the original building is recorded as a significant and important historical building. The	24.05.2021	The loss of the building has been considered in my evidence. The new extensions were provided to serve the previous

		<p>newer accommodation is fairly recent (2002 and 2008?) so is surely usable. Environmentally I believe the requirement is that existing buildings should be adapted where possible to avoid the high environmental impact of demolition and new construction. This is particularly pertinent to SCDC who have made a commitment to sustainability and the environment.</p> <p>In addition, the current 'Hotel Felix' plot forms part of the important green gap between Girton and Cambridge which should be maintained. Also the proposed removal (or relocation?) of substantial trees on this plot to allow for the development will be detrimental to the biodiversity of the local area. I believe one of the trees is a particularly significant one both for its size and scarcity. I would question the need for another care home in this location when Girton area is already very well provided with care homes and other specialist accommodation for elderly people. Another facility would overstretch the existing support facilities such as the local doctors surgery.</p> <p>Finally insufficient thought has been put into transport and car parking arrangements. There are limited buses serving this area, and potentially none at likely shift changeovers so there will be insufficient staff parking on site leading to overspill into adjacent residential areas.</p> <p>I hope that the council will reject this application</p>	<p>hotel function. The existing layout, and quality, of the building, would not adequately serve the needs of a care home.</p> <p>The demolition of this building, for the proposed scheme, would actually represent a betterment in sustainability terms, given the high-quality design of the proposed scheme.</p> <p>The matter of trees have been considered in my evidence. Finally, the Highway Authority have raised no objections to the scheme and the transport technical details which supported the submission.</p>
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6	62 Thornton Road Girton Cambridge Cambridgeshire CB3 0NN	I object to the demolition of this beautiful, historic building which is close to our house. It enhances the neighbourhood and any future use should keep the building.	19.05.2021	The demolition of the building has been considered in my evidence.
7	The White House Manor Farm Road Girton Cambridge Cambridgeshire CB3 0RX	I object to the demolition of this historic building.	18.05.2021	The demolition of the building has been considered in my evidence.
8	233 Beresford Ely CB6 3WW	<p>I object on the grounds expressed so well by (TEXT REMOVED) This is a high-quality building in good condition and eminently suitable for retention and a sympathetic conversion rather than wholesale demolition. The historic core could easily provide attractive communal spaces for a care home. Re-using our buildings is vital in a climate emergency and would follow Historic England's guidance on the importance of reusing and recycling buildings as a way of tackling climate change.</p> <p>The 170-year-old building has obvious architectural and historical significance as part of Cambridge's 19th century expansion.</p> <p>A city like Cambridge should understand how important it is to preserve, wherever possible, the city's building heritage and insist that developers work with it and enhance it... not destroy it needlessly.</p>	17.05.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.
9	45 Hoadly Road Cambridge Cambridgeshire CB3 0HX	I wish to object to the full demolition of this building of interest. It has been here for 170 years. Buildings of interest need	17.05.2021	The demolition of the building has been considered in my evidence.

		to be saved for future generations.		
10	Flat 3 15 Chesterton Road Cambridge Cambridgeshire CB4 3AL	This is a high quality historic building that is an asset to the community. It would be a travesty if it was demolished. Why can it not be converted as it is? Not only is this the most environmentally friendly solution, it also preserves this historic building for future generations.	17.05.2021	<p>The demolition of the building has been considered in my evidence.</p> <p>The existing building is not to a standard to operate as a care home, or to return to operation as a hotel.</p>
11	3 Upper Cavendish Avenue London N3 3NN	<p>1 - The existing drawings of the hotel, plans and elevations are incorrect as submitted as the link building between the wings has not been built and therefore any comparison between the existing and proposed schemes would be misleading as the submission stands.</p> <p>2 - When the hotel was created, very careful consideration was given to the massing and linking of the new elements (which replaced some horrible 1960's extensions) so that they were subservient to the existing Victorian building the main bedroom wings which were set back and linked by single storey buildings. This design reduced the apparent mass of the buildings on what was the tightest piece of the green belt around Cambridge. This openness, together with the playing fields is even more important now that that was the NIAB site has been build upon and the boundary between the city of Cambridge and the village of Girton has become less well defined.</p>	14.05.2021	<p>The link between the 'wings' represents what has previously been approved by the Local Planning Authority.</p> <p>The existing building is not to standard to operate as a care home or return to operation as a hotel. The proposed design, of high quality, takes on the character cues of the existing building, whilst as the same time, having an impact upon the Green Belt which the Council considers to be negligible. Furthermore, the building's design incorporates measures to</p>

		<p>3 - To flatten and replace an existing Victorian building and the new bedroom wings, built only 20 years ago. would appear to have a high carbon footprint than converting the building.</p> <p>4 - The proposed landscaping looks good, but the proposed building is bland.</p> <p>5 - I would support the use of the site to provide high quality accommodation for the elderly.</p> <p>6 - The scheme as submitted should be rejected and the applicant encouraged to be a little more imaginative in the way that the existing buildings could be extended and adapted for the use of the elderly together with smaller carbon footprint from the building works.</p>		increase the long term sustainability to support its use as a care home.
12	8 Poplar Road Histon Cambridge Cambridgeshire CB24 9LN	<p>The Felix Hotel is a beautiful example of Victorian architecture, built in the middle of the 19th century as a family home, which together with a number of interesting trees, has survived for over 150 years.</p> <p>I object strongly to the proposal to demolish this building and raze it to the ground.</p> <p>The original house, which is, and should continue to be, part of our local heritage, must be retained for future generations to enjoy. Once it's demolished. It's gone forever.</p>	05.05.2021	The demolition of the building has been considered in my evidence.
13	Flat 4 Eden Hall Burleigh Street Cambridge Cambridgeshire CB1 1DG	<p>We are writing to register our objections to planning application 21/00953/FUL: Demolition of Hotel Felix (former Country Centre). We strongly object to this application on several grounds,</p>	04.05.2021	The demolition of the building has been considered in my evidence.

		<p>listed below.</p> <p>Historic Value The building is unique in the local area and is a beautiful example of Victorian architecture. It has garnered significant historical and cultural value to the local community since its construction in 1852. Preservation of such unique architecture must be maintained.</p> <p>Although the building is not listed, it is locally listed on the Cambridgeshire Historic Environment Record (CHER) with number 05482 under one of its former names, Howe House.</p> <p>Development Proposal We do not believe that the proposed plan of building a care home facility is necessary nor that it would positively benefit the local area. We already have two care homes for older people in Girton which are already taxing local medical services to a considerable extent.</p> <p>The developers cite uneven floors in the Victorian front of the building as a reason for demolition. There is no reason why, even if a care home was built here, they cannot use the Victorian part of the building for administrative offices, thus preserving part of this historic building. Existing buildings should be re-used wherever possible and not demolished.</p> <p>Sustainability and Environmental Impact We are concerned about the environmental impact of the building's unnecessary demolition, the level of tree loss,</p>	<p>The case of 'need' has been considered in my evidence.</p>
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		<p>and the business plan to ensure this use is sustainable. The trees include a giant sequoia planted in 1853, a cedar of Lebanon of similar antiquity and an oak.</p> <p>Please consider our comments. Girton Parish Council voted against the proposal, and we hope you will do the same.</p>		
14	11 Thornton Road Girton Cambridge Cambridgeshire CB3 0NP	<p>I object to the proposed demolition of this iconic and attractive, period building. Its destruction would be a significant loss to the community.</p> <p>Surely (yet another) care home can be accommodated without destroying it?</p>	04.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building is not to a standard to operate as a care home, or to return to operation as a hotel.</p>
15	158 Huntingdon Road Cambridge Cambridgeshire CB3 0LB	<p>I object to the demolition of this beautiful building. It would make a lovely care home as it is, with some alterations, obviously. The building has been recently updated to a high standard as a good hotel. I do feel that residents of care homes are entitled to live in attractive surroundings - it is their HOME after all!</p> <p>As a retired teacher, I remember coming to courses in the building and appreciating the place, and later I remember it as a lovely place to come for coffee (we live locally). Whatever building is intended to replace it would I suspect be inferior.</p>	04.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building is not to a standard to operate as a care home, or to return to operation as a hotel.</p>

<p>16</p>	<p>23 St Margarets Road Girton Cambridge Cambridgeshire CB3 0LT</p> <p>Please note: This comment was submitted twice.</p>	<p>Firstly we object to the proposal to destroy a beautiful and functional building - it is time we moved on from unnecessary destruction and worked instead with a principle of conserving and re-using buildings. We cite the award of Architecture's most prestigious Pritzker Architecture prize made in March 2021 to Jean-Philippe Vassal and Anne Lacaton for "work that responds to climatic and ecological emergencies of our time, as well as social urgencies, particularly in the realm of urban housing."</p> <p>This project does not match up well against the work of Vassal and Lacaton - and which has now been accepted as being Architecture's best efforts. Surely the Country Centre deserves the best, not the worst of treatments.</p> <p>Secondly we consider that Girton has no need for further facilities to our senior residents. There are already 7 facilities within the village providing increasing levels of care: St Vincent's Close Orchard Close Gretton Court Churchfied Court Abbeyfields Arlington Manor Midfield. Lodge.</p> <p>If this proposed 80 bed facility goes ahead, then consideration needs to be made concerning the 'throughput' of residents. The average length of stay in a care home is 30 months. Thus once the Home is up and running there will be on average some 27 deaths per year, or just over 2 per</p>	<p>03.05.2021</p>	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building is not to a standard to operate as a care home, or to return to operation as a hotel.</p> <p>The case of 'need' has been considered in my evidence.</p> <p>With regards to local impacts, a planning obligation suggested by the Council for contributions towards burial spaces is being actioned, as agreed by the Appellant.</p>
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		<p>month. This is an additional pastoral care requirement for the local churches and support groups to provide (on a voluntary basis). This could be considered to be unacceptable.</p> <p>In addition there is also the question of grave or ashes space. Girton at present does NOT have a public cemetery. However, at a rate of 27 additional graves per year the present graveyard extension (opened in 1996) will be full within a decade. It is therefore essential that IF this development goes ahead, that S106 funding be provided to the community to establish a sizeable public cemetery as a matter of urgency.</p> <p>We trust in the light of these comments you will decide that worthy though the proposal to provide an 80 bed care home somewhere in the East of England may be , it should NOT be in the Country Centre/Hotel Felix, Girton.</p>		
17	14 Thornton Close Girton Cambridge Cambridgeshire CB3 0NQ	<p>The former Felix Hotel has had a long history and is now the only good looking building of its type in Girton and perhaps in South Cambridgeshire. There will never be another building like it constructed in Cambridgeshire. The building has been refurbished well and is so far as I know is in good condition unlike the buildings in poor condition, though capable of repair, demolished in Cambridge to the shame of the planning authority who made the decision at the time.</p> <p>There is no need for another care</p>	03.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building is not to a standard to operate as a care home, or to return to operation as a hotel.</p>

		<p>home in Girton there are already two care homes one named Arlington Manor and the other Midfield lodge and 6 other care homes within 4 miles of Girton. In Girton there are retirement homes at Gretton Court and Girton Green. Eddington has permission to construct a care home.</p> <p>There is no need to demolish a sound, historically important building to provide for a care home, when so many other care homes are available locally.</p>		<p>The case of 'need' has been considered in my evidence.</p>
18	<p>2 Hawkins Road Cambridge Cambridgeshire CB4 2QX</p>	<p>I have no objection to Hotel Felix being redesignated as a care home, but I am concerned about the environmental impact of the building demolition, the level of tree loss, and the business plan to ensure this use is sustainable.</p> <p>The demolition of the building will result in a high additional carbon output. While I understand that the structure of the building will need substantial changes, it would be reassuring to understand how the options for this have been considered. I hope the planning committee will request a full report on the options to preserve as much of the existing building as possible, particularly the historic facade, whilst still allowing the change of use.</p> <p>I am concerned that the business plan for the change of use is not shared here, and I feel there is a risk that the cost of being accommodated at Hotel Felix will be prohibitive to some people. Is it possible for the planning committee to see the business</p>	03.05.2021	<p>As demonstrated in the submission, the proposed scheme would deliver a highly sustainable care home, both materially and in operation. Conversion of the existing building would not allow the same level of sustainability benefit to be captured.</p>

		<p>plan for the new use to confirm that this change of use will not exclude some people from seeking support here?</p> <p>Will the Giant Sequoia be preserved? This is an historic and rare tree.</p>		
19	9 Bandon Road Girton Cambridge Cambridgeshire CB3 0LU	<p>I would like to object to this application on the grounds that I do not consider the demolition of such a fine old building, with a varied and interesting history, to be necessary.</p> <p>An imaginative architect could easily fuse the old and the new, creating a building that retained the character of the existing hotel, whilst at the same time, updating its features and adding to the structure in a sympathetic and aesthetically pleasing way.</p> <p>I understand that this home will be aimed at those with considerable finances at their disposal, so money shouldn't be a problem, and in fact, I am sure its future clientele will appreciate living in a restored home, not a brand new anonymous generic building.</p>	03.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building is not to a standard to operate as a care home, or to return to operation as a hotel.</p> <p>The architects utilised in the scheme are highly experienced in delivering care homes and the design proposed is of high quality, especially in the design cues it takes from the original building.</p>
20	125 Girton Road Girton Cambridge Cambridgeshire CB3 0LS	<p>The former Hotel Felix is a beautiful and historic building which is part of Girton's history. Me and my family, and many others in Girton, have long enjoyed walking nearby and admiring the unusual and</p>	03.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been</p>

		<p>attractive architecture of the building. Demolishing it would mean the loss of this forever, and would have a detrimental effect on the local area. I feel strongly that this should not happen, because, over the past decade and more, we have already watched as other lovely old buildings on Huntingdon Road have been demolished and replaced with modern apartments. The local area is losing its character as these developments take over. We have a duty to preserve old historic buildings for future generations and therefore I strongly object to the demolition of the former Hotel Felix.</p>		<p>considered in my evidence.</p>
21	<p>Howe House Huntingdon Road Girton Cambridge Cambridgeshire CB3 0LX</p>	<p>This is a magnificent building that adds dignity to the neighbourhood. Furthermore, it is an integral part of the green belt and the wildlife corridor. It stands as a monument to its history, and its landscape (including trees) and its reputation are things that should be preserved. I have no objection to the proposed use, but believe that the existing building, in particular the beautifully designed parts of it, should be incorporated into any development. This would enable the proposed residents to have a home in which they could take pride and enjoy welcoming their guests. I can see no reason why any developer would not also want this, other than cost. But if they cannot afford even this, how can we trust them to build anything of quality?</p>	03.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building is not to a standard to operate as a care home, or to return to operation as a hotel.</p>
22	<p>48 Thornton Court Girton Cambridge</p>	<p>I strongly object to the demolition of the former Hotel Felix. It is the most significant heritage building</p>	02.05.2021	<p>The existing building is not to a standard to</p>

	Cambridgeshire CB3 ONS	to have been proposed for demolition in the area. As in the past, together with its outbuildings, it could still be used for further education for example. We already have two care homes for older people in Girton which are already taxing local medical services to a considerable extent. We certainly do not need another eighty bed care home on this site in Girton.		operate as a care home, or to return to operation as a hotel. The case of 'need' has been considered in my evidence.
23	43A Hicks Lane Girton Cambridge Cambridgeshire CB3 0JS	I am writing to object to the proposal to demolish the former Hotel Felix (planning application No 21/00953/FUL) on the grounds that the building is unique and is a fascinating example of mid-Victorian architecture. Preservation of such unique architecture must be maintained and if it is not already a listed building then I trust that consideration will be given to making it just such a building because its design and provenance are unique and fascinating. Such wonderful buildings are increasingly rare due to the reckless attitude of developers who can very easily use other sites on which to build their modern constructions and the demolition of the building used most recently as the Hotel Felix would be reckless, unnecessary, and would show total disregard for beautiful and historic artefacts which can never be replaced once destroyed but which are vital to the heritage of this country.	02.05.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence. The existing building is not to standard to operate as a care home or return to operation as a hotel. The proposed design, of high quality, takes on the character cues of the existing building, whilst as the same time, having an impact upon the Green Belt which the Council considers to be negligible.
24	Trinity Farm Huntingdon Road Girton Cambridge	It seems very short sighted and destructive to demolish the building that is Hotel Felix. It is a	02.05.2021	The demolition of the building (a non-designated

	<p>Cambridgeshire CB3 OLG</p>	<p>beautiful Victorian villa of outstanding design, combining a Dutch gable and circular bow windows which has graced Huntingdon Road since 1852. The gardens are beautiful with a stunning sequoia tree in the grounds and have always added to the sense of the important 'Girton gap'. The main reason given for wanting to demolish the building is to avoid changes of level in the building. This was not a problem when the Hotel Felix owners developed the site and created new modern facilities around the existing house while retaining the main house as its beating heart. If this building is to become a nursing home, the original house could be kept as a community hub for the new outbuildings and accommodation. Apart from the destruction of a beautiful building and grounds, I do not understand why it is deemed acceptable that elderly people have to live out their last years in faceless rooms and buildings, packed away into a nursing facility rather than being part of a graceful home and gardens. It's heartbreaking.</p>		<p>heritage asset of low significance) has been considered in my evidence. The existing building is not to standard to operate as a care home or return to operation as a hotel. The proposed building is of a high quality design, which as well as being highly sustainable, recognises the design characteristics of the existing building.</p>
<p>25</p>	<p>18 Orchard Avenue Cambridge Cambridgeshire CB4 2AH</p>	<p>I object to the proposal to demolish the Hotel Felix building and the removal of rare trees on the site. The trees include a giant sequoia planted in 1853, a cedar of Lebanon of similar antiquity and an oak. The demolition and rebuilding would cause environmental damage on a scale which is illegal under new legislation. The area will lose an attractive building surrounded by trees which is a local amenity. There is</p>	<p>02.05.2021</p>	<p>The Tree Officer has raised no objection to the scheme, with landscaping improvement sought to improve the impact of the proposal upon the surrounding area (including Green Belt).</p>

		no need for another care home in this part of town and one which is likely to be unaffordable for many people. Girton Parish Council voted against the proposal and I support this.		
26	11 Fairway Girton Cambridge Cambridgeshire CB3 0QF	<p>I object to this development for the following reasons: This beautiful old Victorian building is a much-loved feature of Girton village. It has an elegant and graceful facade, unique in its bow front and gable roofline. It would be a tragedy for this to be bulldozed to make way for yet another faceless, utilitarian construction. It appears that no consideration of the feelings of those who live in Girton, and their affection for this building, has been taken into account.</p> <p>The developers cite uneven floors in the Victorian front of the building as a reason for demolition. Whilst such floors could indeed be hazardous to frail care home residents, there is no reason why, even if a care home was built here, they cannot use the Victorian part of the building for administrative offices, visitor reception, storage, etc., thus preserving at least the outer shell of the building.</p> <p>Girton surely does not need yet another assisted living establishment, and especially not one which will be exclusive to the majority of Girton residents, the vast majority of whom will not be able to afford this care home. If they can do so at the beginning of their stay, it is very possible that their funds will soon be used up, and their families placed in the appalling position of having to move them out into different accommodation at a most</p>	02.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building is not to standard to operate as a care home or return to operation as a hotel.</p> <p>The case of 'need' has been considered in my evidence.</p> <p>The proposed building is of a high quality design, which as well as being highly sustainable, recognises the design characteristics of the existing building.</p>

		<p>vulnerable stage of their lives. In a demolition such as this, it will take hundreds of years to sequester the carbon generated, not to mention that generated in construction of the new building. At a time when we should all be environmentally aware, surely reusing the existing building is entirely the right thing to do. There is no reason why the existing hotel bedrooms cannot be reused either. My objection to demolishing these, as they are of less architectural merit, is entirely on environmental grounds. I note that the developers of this project quote with pride the work they have done on the Prince of Wales's model village, Poundbury. I wonder what Prince Charles would say about the demolition of this beautiful old building, to make way for what he might well describe as another 'monstrous carbuncle'.</p>		
27	<p>Middlefield Huntingdon Road Girton Cambridge Cambridgeshire CB3 0LH</p>	<p>Although it is not listed, this building is an important heritage building in the Girton locality. There are very few such buildings in Girton, and this is an admirable example dating from 1852. The Victorian frontage is a particularly outstanding feature. More active protection is needed from property entrepreneurs who single out and develop beautiful historic building sites for commercial motives, usually transforming them into utilitarian and characterless buildings. In any case there are already many assisted-living developments in Girton.</p>	01.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p>
28	<p>26A St Vincents Close Girton Cambridge</p>	<p>I STRONGLY object to the demolition and destruction of what should be a listed building,</p>	01.05.2021	<p>The demolition of the building (a non-designated</p>

	Cambridgeshire CB3 0PE	and the construction of yet another unwanted retirement/dementia home. Such a project should be stopped immediately as the planners are taking advantage of a national pandemic in order to push through their horrible plans. The Felix is a beautiful, iconic and historic Victorian building of importance to the area. 'They' have even had the gall to engineer their own comments on their own application. The whole project should be stopped immediately.		heritage asset of low significance) has been considered in my evidence. The case of 'need', for older people's accommodation, has been considered in my evidence.
29	131 Devonshire Road London NW7 1EA	Felix Hotel provided much needed services - hotel, restaurant, employer, in Girton - a village in acute need of all those services. I understand the need to house the elderly, I disagree with pillaging vital infrastructure to do so.	01.05.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence. The case of 'need', for older people's accommodation, has been considered in my evidence.
30	195 Victoria Road Cambridge Cambridgeshire CB4 3LF	The destruction of historic Victorian buildings on Station Road a few years ago was allowed to happen because objections were ignored in the pursuit of money. They are gone forever replaced by offices, one of which has already been knocked down and replaced. How is that environmentally friendly? Knocking down hotel Felix is comparable in its cultural vandalism. The building would be a much nicer environment for	30.04.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence. The case of 'need', for older people's accommodation, has been

		residents and it will speed up and reduce the costs of the project to keep it. Nearly all people I have spoken to and who got in touch from my leaflets in the area want Hotel Felix saved for future generations to enjoy. I can't stress enough how bad an idea it is to bulldoze it.		considered in my evidence.
31	62 Isaacson Road Burwell Cambridge CB25 0AF	I object to the proposal to demolish the Hotel Felix building and the rare trees on the site. The demolition and rebuilding would cause environmental damage on a scale which is now illegal under new legislation. In addition, there is absolutely no need for an additional care home for the elderly when there are already seven such homes in the Girton area. The Felix Hotel complex includes a Victorian House built in 1852 and in excellent condition. There is a giant sequoia planted in 1853, a cedar of Lebanon and a very old oak amongst the trees which the developers plan to destroy. A site such as this requires sympathetic development, with retention of the natural features, historic interest and environmental assets of the existing site, not wholesale destruction.	30.04.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence. The case of 'need', for older people's accommodation, has been considered in my evidence. The Tree Officer has raised no objection to the scheme, with landscaping improvement sought to improve the impact of the proposal upon the surrounding area (including Green Belt).
32	26 Arcadia Gardens Oakington And Westwick Cambridge Cambridgeshire CB24 3AJ	This Victorian landmark is locally listed (05482) and is part of the heritage of Cambridge. The surrounding grounds contain trees (some of which should be listed) and open space providing a break between Girton and Cambridge development. Building a care home here will benefit only	29.04.2021	The proposed care home would support local care needs in South Cambridgeshire, especially the pressing need to provide

		<p>the very wealthy, as it seems intended for high cost care, and will not provide help for local residents as these plans stand. The building and grounds should be preserved and a more community-based project supported for them.</p>		<p>accommodation for older people.</p>
33	<p>40 Kitchener Road Great Yarmouth NR30 4HU</p>	<p>It is not environmentally sustainable to demolish useful buildings. Development has huge environmental and community impacts and should deliver additional useful buildings on fresh sites.</p>	<p>29.04.2021</p>	<p>The proposed building would be highly sustainable, given its high-quality design, as demonstrated by the supporting technical information. The existing building would not be able to return to operation as a hotel, let alone operate as a care home.</p>
34	<p>9A Holyrood Close Cambridge Cambridgeshire CB4 3NE</p>	<p>I object to the destruction of this elegant house, which should be a listed building. It is much loved by those who have used it as The Country Centre and Hotel Felix. Cambridge has lost too many historic buildings of architectural merit and has many care homes. Equally scandalous is the chopping down of rare trees, which also should be listed. The sequoia is more than 150 years old. The residents of the Darwin Green development could benefit from this building and garden if a public use could be found.</p>	<p>28.04.2021</p>	<p>The proposed care home would support local care needs in South Cambridgeshire, especially the pressing need to provide accommodation for older people.</p>
35	<p>14 Pettitts Close Dry Drayton Cambridge</p>	<p>I wish to strongly object to the new owners wishing to demolish this fine Victorian house circa 1850 and build a new 80 bed</p>	<p>28.04.2021</p>	<p>The demolition of the building (a non-designated heritage asset of</p>

	Cambridgeshire CB23 8DQ	nursing home. We have seen too many such applications being granted to destroy historic properties and allowing the building of a new property. This is a valued Victorian house and should be preserved instead and developed as required. South Cambs have a responsibility to preserve and I strongly request that they do so for this application. Please stand up for this and future generations by refusing the application.		low significance) has been considered in my evidence.
36	36 High Street Girton Cambridge Cambridgeshire CB3 0PU	I object to the proposal to demolish the former Hotel Felix and build an 80 bed care and specialist dementia care home on the following grounds: firstly, the Hotel Felix, built around the former Howe House, is locally listed as number 05482 on the Cambridgeshire Historic Environment Record (CHER). It is therefore recognised as a heritage asset, and is of great local and wider significance, both historically and culturally. Demolition would rob us of a much-valued local landmark and cultural asset; secondly such a development, as advertised by the developers, would clearly be at the luxury and therefore most expensive end of the market, so that its is difficult to see how this would serve the local community. Moreover, it would make huge demands on our local health services and would have a serious impact on the demographic balance of our community.	28.04.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence. The site is ideally located for a care home, of which there is a pressing need to provide accommodation for older people, as outlined in my evidence.
37	9 Station Road Oakington And Westwick Cambridge	The core of the Hotel Felix is a magnificent Victorian villa constructed in 1852 for Charles Lestourgeon, an eminent surgeon	26.04.2021	The demolition of the building (a non-designated heritage asset of

	<p>Cambridgeshire CB24 3AH</p>	<p>in Cambridge. Formerly called Howe House, Howes and The Close, it was used as a private house for over a century. In 2002 it was renovated to the highest standard as a luxury hotel. The house captures the exuberance of the Victorian age with an interesting and unusual design, combining Dutch gables with a circular bow window, and is set in spacious grounds.</p> <p>This site lies outside the Girton village envelope in the Cambridge Green Belt. It is the only substantial building situated in the Girton Gap - the area of land set aside to prevent Girton village from merging with Cambridge City. The site straddles the Girton Gap, making a continuous connection between the village and the city. It was thought that the extensions added in 2002 and 2008 would make the hotel viable as a business and safeguard the future of the Victorian building. A new build hotel would never have been allowed in that location.</p> <p>I object to the demolition of this important heritage building. Material planning grounds are:</p> <p>[A] Heritage The Hotel Felix is not nationally listed as the criteria have been tightened to the point where only the most exceptional buildings can be listed. However, it is locally listed on the Cambridgeshire Historic Environment Record (CHER) with number 05482 under one of its former names, Howe House.</p> <p>It therefore meets the definition of a Heritage Asset as defined in the National Planning Policy</p>	<p>low significance) has been considered in my evidence.</p> <p>The proposed scheme represents a high-quality design that incorporates key principles of sustainability.</p> <p>The case for the need for the care home is outlined in my Proof of Evidence.</p> <p>There are 'Very Special Circumstances' as outlined in my evidence to bring forward the care home scheme.</p>
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		<p>Framework (NPPF) p67, which includes assets identified for local listing.</p> <p>NPPF Paragraphs 184 - 202, including: 184. "Heritage assets range from sites and buildings of local historic value to those of the highest significance, ... These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations."</p> <p>192. "In determining applications, local planning authorities should take account of (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation" etc.</p> <p>197. "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."</p> <p>This is echoed in the Local Plan 2018:</p> <p>Policy NH/14: Heritage Assets, particularly 2(d) for non-designated heritage assets. Paragraphs 6.43 - 6.58, including: 6.45 "The district's character is</p>		
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	<p>largely shaped by its heritage, including that of its much loved historic villages and countryside."</p> <p>6.47 "The distinctive character and quality of life given by the historic environment of the area has been key to its economic success."</p> <p>6.48 "Heritage is an essential component of plans from a village or neighbourhood level to that of the district."</p> <p>6.51 "Finding viable uses which sustain rather than compromise the significance of historic buildings is fundamental to conservation ... The Council is committed to ensuring the future viable uses of assets within the district. "</p> <p>6.52 "Decisions on development proposals must be based on a good understanding of how the proposals will affect heritage. ..."</p> <p>Policy HQ/1: Design Principles, particularly 1(b) which states that proposals must conserve or enhance historic assets and their setting.</p> <p>Policy DP/1: Sustainable Development 1. "Development will only be permitted where it is demonstrated that it is consistent with the principles of sustainable development,... It should (r) Conserve and wherever possible enhance cultural heritage."</p> <p>The applicant has not demonstrated that the demolition of the Victorian villa is necessary in order to construct an 80 bed care home on the site. They have</p>	
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not considered the possibility of preserving the villa and building next to it. There are many ancillary uses such as administration, offices, staff or visitor accommodation that it could be used for.

There are many other places in Girton to build a care home, and many other uses for the site that would not require demolition. There is a luxury hotel under construction less than 500m away in Eddington, showing that this is not an inappropriate location for a hotel. The Council should not consider the very temporary and short-term effect of coronavirus in determining that there is need for a change of use at this site.

The NPPF also states:
202. "Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies."

This shows that Policy NH/9 should not require the care home to have fewer beds if the villa is preserved.

[B] Sustainability
Existing buildings should be re-used wherever possible and not demolished. This is especially the case with Victorian buildings that are not constructed using obsolescent building materials and have a considerably longer useful lifespan than modern buildings.

		<p>Sustainable Design and Construction SPD</p> <p>4.6.1 "The construction industry is the single largest user of materials in the UK. 420 million tonnes of materials are consumed in construction annually. In addition to this, about 10% of national energy consumption is used in the production and transport of construction products and materials."</p> <p>1.3 "Sustainable design and construction seeks to lower consumption of resources, both in the construction of new buildings and in their use..."</p> <p>3.10.1 "Historic buildings and settlements often have sustainable forms of construction and design, and they can inform and inspire the best modern, sustainable development. Their survival reflects their success and adaptability."</p> <p>3.10.2 "Adaptive re-use of a building gives significant carbon savings in terms of embodied energy in the fabric of the building, ..."</p>		
38	84 Girton Road Girton Cambridge Cambridgeshire CB3 0LN	<p>This project will not meet any of the climate change agendas and will set a dark precedent for Cambridge if we allow this type of carbon intensive project to go ahead in this form.</p> <p>Data from the U.N and the U.S Energy Information Administration shows that about 75% of the carbon emitted during a building's life cycle comes from its construction and demolition with the other 25% from it's</p>	26.04.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The proposed care home is of a high quality design, incorporating</p>

		<p>operations. If this new building is then built to the base level minimum standards of building regulations, which is what they are saying will be the case, then in 10 - 15 years time they would need to spend more money on retrofit work as it wont meet the new environmental standard which the government is set to announce at COP 26. So why not save themselves that time and effort and just retrofit the existing structure as best they can, or find another site.</p> <p>If I was a resident in a care home, I'd much rather sit outside a building with historic value than one with no soul.</p>		<p>matters of sustainability, whilst respecting the existing building through the approach to the proposal's design and appearance.</p>
39	37 Woodlands Park Girton Cambridge Cambridgeshire CB3 0QB	<p>I am writing to register an objection to planning application 21/00953/FUL on the grounds of:</p> <p>1) Effect on a locally listed (non-designated) heritage asset; and 2) Effect on the Girton area (balance of use, lack of need, environmental impact).</p> <p>Expanding on these points:</p> <p>1) Effect on a locally listed (non-designated) heritage asset</p> <p>Hotel Felix (formerly How House) is locally listed under Cambridgeshire Historic Environment Record (CHER) number 05482. The SCDC Local Plan (2018) clause 6.56 states: "The Cambridgeshire Historic Environment Record, maintained by the County Council, provides information on heritage assets, including non-designated and designated heritage assets with archaeological interest..." It surely follows that the principles of</p>	25.04.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The case for 'need' has been established through my Proof of Evidence, as well as the separate Proof of Evidence specific to 'Need'.</p>

clause 6.49 (echoed in NPPF 2019 s196-197) would also apply, including: "...Where development would lead to the substantial harm or total loss of significance of a designated asset, the local planning authority should refuse consent unless demonstrated it is necessary to achieve substantial public benefit that outweigh the harm or loss. Proposals leading to less than substantial harm to the significance should also be weighed against public benefits of the proposal. For proposals affecting non-designated assets a balanced judgement will be made, having regard to the scale of any harm or loss and the significance of the heritage asset."

Given that a) the proposal would lead to total destruction of the building; b) the high local significance of this non-designated heritage asset to Girton (poignantly highlighted in the fast-track application for listing immunity which was applied for prior to this planning application); c) the lack of benefit to Girton (see point 2, below) and the negative environmental impact of demolishing a structurally sound building, the balance seems heavily tipped against this proposal.

2) Effect on the Girton area (balance of use, lack of need, environmental impact)

A "Care Home Needs Assessment" document accompanies this application, however the developer's marketing materials go to enormous lengths to emphasize how "ultra-high end" and explicitly

non-standard their new concept would be (Michelin-trained chefs, luxury chauffeur-driven cars, in-house mixologists etc.). The needs assessment does not mention Girton even once; only national and regional data. But Girton already has excellent aged care provision and, if anything, appears overweight in this sector. Cambridgeshireinsight.org.uk for Cambridgeshire County Council forecasts the 2021 Girton population as 5800 and, today, a quick tally of aged care facilities in and on the boundary of Girton (Gretton Court, Arlington Manor, Girton Green, Midfield Lodge, Churchfield Court, Orchard Close, St Vincent's Close) indicates 363 accommodation units with many of these comprising 2 or 3 bedroom properties. All parts of the aged care spectrum are covered, from sheltered housing through to specialist residential dementia care - Girton is truly blessed in this capacity, in contrast with many other parts of South Cambridgeshire.

It would therefore seem wrong to interpret that the care home needs assessment document supports any needs-basis for this proposal in Girton. Considered alongside SCDC Local Plan (2018) clause 7.36 which emphasises the importance of planning for a mixed and balanced community based on the needs of different groups, and clause 7.39 which specifically states that "...Where appropriate, specialist accommodation for the elderly should be provided on a mixed-tenure basis, and such accommodation should be located on sites in new settlements or within larger

		<p>villages.", it is also difficult to understand why any regional need should not be fulfilled within one of the new settlements under development, such as Darwin Green or Eddington. This would of course avoid the negative environmental impact of such a massive demolition and rebuild process (besides the above-mentioned loss of a locally listed heritage asset).</p> <p>This magnificent building has been standing strong for 170 years and deserves better than demolition. As well as serving Girton as a local landmark predating the first Ordnance Survey maps, it has functioned in various roles from private residence to educational establishment to an award-winning hospitality venue, demonstrating versatility to match its beauty. The suggestion that it is - suddenly - so insignificant that value could only be derived through demolition (an incredibly environmentally unfriendly approach) to make way for an "ultra-luxury" care home in Girton, an area without any need for this, is implausible and feels incongruous within the framework of the SCDC Local Plan (2018) both from objective and policy standpoints. For these reasons I hope you reject the application.</p>		
40	28 Shrewsbury Road Cambridge Cambridgeshire CB3 0SJ	I strongly object to the proposed demolition of Hotel Felix. The buildings on its grounds are part of our local heritage, they have historic significance and would be enjoyed much more by future residents than the concrete	21.04.2021	The demolition of the building (a non-designated heritage asset of low significance) has been

		monstrosity that is proposed as an alternative. I trust that with clever architectural adaptations inside the building can still be preserved rather than completely destroyed.		considered in my evidence.
41	7 Halifax Road Cambridge Cambridgeshire CB4 3QB	Whilst I am not against a new care home opening in this location, I object to the demolition of this beautifully-appointed and well-equipped building, in good repair and full of historic importance. I would accept the present building being converted into a care home, if this meant that the building could be saved, though I would prefer that the Felix be retained as a hotel.	19.04.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.
42	Suite I1 Cambridge Innovation Park Denny End Road Waterbeach Cambridge Cambridgeshire CB25 9QE	<p>Having reviewed the planning submission there are many areas that are a cause for concern and contradiction. The Energy Strategy Review on page 7 of the sustainability statement says "Be lean, Be Clean and Be Green". This is just one of the many contradictory statements within this planning application. The project starts with the demolition of a historic building which is subjective in its claims that there is little historical significance. The "facts" in the heritage statement use inaccurate map overlays to claim that the historic building has been subjected to "countless alterations" when this information is baseless and inadmissible.</p> <p>The most significant impact for this development comes in the form of Climate adaption and Energy and Carbon reduction. This subject covers a wide range of issues with this development proposal so to break them down, I</p>	16.04.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The new building would be highly sustainable in design and function, as evidenced by the details. The building has been subject to extensive alterations, as demonstrated by the number of planning permissions accepted on site.</p>

will look at some of the base elements. The sustainability statement says; "The proposed development has been developed to minimise waste generation". This is contradictory and ignores the very essence of the application which proposes to demolish the whole building in order to simply maximize profitability in room sizes. What considerations have been made to the tonnes of construction waste being removed along the residential road of Whitehouse lane, and what climate change policies are in place with the applicant and also the Planning office, to mitigate the embodied Carbon associated with all the removal lorries, demolition process, construction waste being removed to landfill. This is a significant amount of embodied carbon being released into the atmosphere simply through the act of demolition. How can the council support this application when it is in clear contradiction to planning policies HQ/1: "mitigate and adapt to the impacts of climate change", Policy NH/8: "Mitigate the Impact of Development in and adjoining Green Belt", Policy CC/1: "Mitigation and Adaption to Climate Change"

If the council were to support this application they should carefully consider the issues of;

The Carbon footprint from construction and demolition

- o Does this project align with the local, national and global agendas which aim to meet the 2050 climate change agenda and the Paris Climate agreement?

		<p>Operational Carbon</p> <ul style="list-style-type: none">o The proposed construction typology aims to simply meet the base level requirements of Building Regs, but also claims a "fabric first" approach as one of their sustainability agendas. These are contradictory and poor quality construction and specification will result in increased operational energy consumption and subsequent carbon emissions. Add this to the construction and demolition footprint then we have an embodied carbon agenda that will hugely exceed the national framework for 2050 carbon goals. <p>Ecology</p> <ul style="list-style-type: none">o The Ecology report (4.3.6) states that evidence of a protected species of bats has been found within the roof of the existing historical building, yet this is simply addressed with a derisory mention within the main planning application documentation of, "replacement bat roosting opportunities will be provided in suitable locations". What active measures are being taken to support and enhance the local wildlife within this green belt area which has significant biodiversity implications? To support the displacement of a protected species to a "box" will set a very poor precedent in the protection of local protected species roosting within a historic building.o Section 3.20 of the planning statement refers to "two areas of biodiverse roofs comprising pre-sown wildflower mats", these details do not appear on the proposed designs. Are these areas of significant enough scale to support the claim of a bio-		
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		<p>diverse roof space or are they just a statement piece that won't add any significant value?</p> <ul style="list-style-type: none">o Cat A tree in the central courtyard to be "removed and replaced" - How can this be justified?o The location of the proposed sensory garden is an area that regularly floods, climate change predicts an increase in precipitation, what measures are being taken and how will they impact this important factor of bio-diversity. Will the SuDs improve or reduce the flow of the small stream which runs along the perimeter line? (Also not mentioned in the plans) <p>Energy</p> <ul style="list-style-type: none">o The project proposes the use of a CHP system that will "deliver a 10% reduction in carbon dioxide emissions". The reduction baseline is from the Part L2A building regs which is a minimum standard. With a project that is releasing so much carbon through the demolition and construction process, it should be targeting a much higher performance level as this 10% reduction is from a negative starting position in terms of carbon emissions. Whole life carbon assessments should be undertaken.o The plans do not demonstrate how the development aims to incorporate renewable energy into the build. The sustainability statement other documents mention the use of PV panels, but the roofline of the building has not been optimized to maximize the potential solar gains <p>These are just some of the obvious reasons why I wish to</p>		
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		<p>object to this application. The fact they wish to knock down a 60-bed hotel to build an 80-bed care home just sounds ridiculous. I am 100% sure that not all the options were explored to save this hotel. It's a sad sign of the times that during a climate crisis, we are still supporting projects like this that destroy our heritage and build carbon-rich projects that destroy our planet, all in the name of profit. I hope the planners see sense and reject this plan for one that is better considered for its wider impact.</p>		
43	<p>9 Marks Way Girton Cambridge Cambridgeshire CB3 0PW</p>	<p>I read with great dismay in Girton Parish News of the proposed demolition of the Hotel Felix. Not only was this the historic home of a Cambridge don, mentioned in the Girton History, but it was also the Country Centre for many years, seat of wonderful educational learning and courses for Cambridgeshire teachers. Quite apart from these reasons, it is a beautiful, gracious and fascinating building and I grew extremely fond of it as a special local amenity. The trees, particularly the large sequoia, were used by course leaders at the Country Centre to demonstrate nature activities and creative ideas for teachers to use in schools. They are of huge natural, educational, aesthetic and historic importance and interest.</p> <p>I am strongly against the proposed demolition.</p> <p>I have read the details of the proposed new build and want to make it clear that I am not against a new care home opening in this</p>	16.04.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p>

		<p>location. I am against the demolition of a fine, beautifully appointed and well-equipped building, in good repair and full of historic importance, and the proposal that it is razed to the ground and replaced. I would certainly accept (though I would prefer that the Felix was retained as a hotel, as it is perfectly appointed for this) the present building being converted into a care home, if this meant that the building could be saved.</p> <p>My father spent the last years of his life in a wonderful care home in a Victorian building in Leeds, the former stately home of several historic figures. It was a beautiful and fascinating place for him to be and he loved living in a place of history. Its original features were one of the main sources of its delight and reasons for choosing it.</p> <p>If the Felix was crumbling, damp, dangerous or beyond saving, or even ugly and an eyesore, that would be different. It is none of these things.</p> <p>I have recently been reading about Girton's history in three fascinating books which were compiled by residents in the 1940s and 50s. I can see no rhyme or reason for demolishing the building, either from a historic, architectural, aesthetic or functional viewpoint. It can easily be adapted for re-use and is recently refurbished to a high standard. It is special, unique and irreplaceable.</p>		
44	10 Sherlock Court Sherlock Road Cambridge	Why knock down a building with so much history and heritage? Why not find another, more	15.04.2021	

	Cambridgeshire CB3 0JB	appropriate use for it? Huntingdon Road is already busy enough without a huge new residence and Whitehouse Lane is far too small for any more traffic.		
45	35 Shrewsbury Road Cambridge Cambridgeshire CB3 0SJ	The ex-hotel is a lovely, stylish Victorian building which is beautiful to look at, is part of our heritage and an important part of Cambridge history. The thought of knocking it down and replacing it with a modern soulless box is anathema. Let us keep our heritage for all generations in the city and use it for other activities.	14.04.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence. The proposed scheme represents a high quality design, with architectural details that reflect upon the existing building.
46	9 Mark Way, Girton, Cambridge, CB3 0PW	Strongly against the demolition of a fine, beautifully appointed and well-equipped building, in good repair and full of historic importance, and the proposal that it is razed to the ground and replaced. The building was home to of a Cambridge don and also the County Centre for many years. The trees were used to demonstrate nature activities and creative ideas for teachers to use in schools. They are of natural, educational, aesthetic and historic importance. I question the need for a new care home in this location. There are already a number of homes for the retired and elderly in the village including the recent Arlington Manor. I would prefer the present building be converted into a care home rather than be	11.07.2022	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence. With regards to location, the site is sustainably located and the site represents previously developed land.

		demolished however there is much greater need for a hotel in the area of which there are none in Girton.		
47	Huntingdon Road Surgery	<p>We are concerned that sufficient consideration may not have been given as to the primary medical care requirements to service this new care home. In order to provide safe and effective medical support for a care home of this size requires a dedicated GP for at least one day per week to cover the workload involved. Provisions of this service will reduce our capacity to manage the patients currently registered at out practice particularly as we have to service two similar care homes in our practice area.</p> <p>The combination of the anticipated growth rate of the practice area, staff recruitment and present buildings space challenges means that we are not in a position to support this size of care home without increasing our property footprint. We cannot agree to provide care to the new home without support from the CCG.</p>	14.06.2022	<p>An extract from the submitted plans shows space for visiting GPs. In addition, we also have a therapy room with therapy chair</p> <p>As a care home, the Appellant employs their own nurses directly so this has a beneficial reduction on any visits to or from a GP as they are able to deal ourselves or wait till a visit is scheduled.</p> <p>Again, it is usual for the residents (who are usually local) to be already registered with one of these local GP's prior to moving to our home.</p> <p>That is why the health benefits overall are positive not negative</p> <p>As a final point the operator</p>

				usually agree a retainer with a local doctors surgery and a yearly fee is set aside for this but, this does not form part of any 106 agreement or condition (as not needed under CIL regs), it is between the operator and chosen GP and is usual bespoke to each site.
48	Graham Wright Architects	<p>I am the original architect of the Felix Hotel.</p> <p>The existing building is sound and does not need to be knocked down. The store cupboards within the wings were designed to accommodate future lifts to make 95% of the building accessible. The corridors were ramped to resolve the problems of different levels to avoid using lifts all the time. It could be used as a care home with very little external modification.</p>	26.03.2022	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building cannot be converted to to operate as a care home or return to operation as a hotel.</p>
49	11 Brook Close, Histon, CB24 9XL	<p>I wish to register my rejection of the plan to destroy the Felix Hotel. I used to attend courses there when it was the County Centre.</p>	03.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p>

<p>50</p>	<p>69 Cambridge Road, Girton, CB3 OPN</p>	<p>The Planning Need Assessment is flawed as it is based on national and local statistics that can be viewed any way to suit the case. There is no overriding need for such accommodation in Girton where there is already plenty. The real issue is the case for demolishing the building for intensification of land use and profit for the developer.</p> <p>Cambridge in general and Girton in particular are very short of Victorian Buildings of any merit and this is a strong example. There will be soon no history outside of the university.</p>	<p>06.05.2021</p>	<p>The case for 'need' has been made in my Proof of Evidence. The separate Proof of Evidence on 'Need' has been assessed by experts in this field. There is such a need.</p>
<p>51</p>	<p>The White House, 2B St Margaret's Road</p> <p>Comment submitted twice</p>	<p>I wish to object on the following grounds:</p> <ul style="list-style-type: none"> • we already have a variety of residential facilities and care homes for the elderly and need no more. • If there is a need a less expensive area should be chosen. • The proposal is for 5 star accommodation. The proposed facility will do nothing to help the council provide its statutory duty of social care. • The suggestion that Girton will benefit from high employment is laughable. Care home staff will not be able to afford local housing. • There is already strain on medical provision in the area <p>Although not listed the building is of considerable charm in its own setting and adds to the environment</p>	<p>29.04.2021</p>	<p>The case of 'need' is evidenced in my Proof. Quite simply, there remains a need to provide accommodation for older people.</p> <p>The scheme will provide benefits in job creation, as well as serving the care needs of the surrounding area.</p>

52	42 Hawthorn Way	<p>I object to the demolition of hotel Felix and the cutting down of rare trees based on:</p> <ul style="list-style-type: none"> • The architectural merit of 1852 Howe House. • The fact that the trees that would be cut down include a giant sequoia planted in 1853, a cedar from Lebanon and an oak among other valuable rare trees • The environmental damage if the demolition/ construction is carried out • The demolition/ construction would result in a loss of amenity as access to the grounds would be lost of Cambridge and Girton Residents • The nature of the proposed new building is not ecologically friendly <p>The area does not need the top of the range old peoples home</p>	30.04.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>Tree and landscaping impacts have been considered with the submission and within my evidence. No objections were received from the Council's Wildlife and Tree Officers.</p>
53	<p>19 Richmond Road, Cambridge, CB4 3PP</p> <p>Comment repeated three times with cover email.</p>	<p>I object to the demolition of Howe House built in 1852. It has a rich local history and a close connection to Girton College. This is an attractive building externally whose interior is unspoilt and rich in Victorian detail. The building is in excellent condition.</p> <p>The proposed development would include cutting down of a giant sequoia which could be the oldest example of this type of redwood in the UK.</p> <p>The demolition involved would carry a high environmental cost. The proposed new building is hideous and does not comply with the most recent environmental standards. The plans are contradicting.</p>	30.04.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>Tree and landscaping impacts have been considered with the submission and within my evidence. No objections were received from the Council's Wildlife</p>

				and Tree Officers.
54	Cambridge Past, Present and Future	<p>Object:</p> <ul style="list-style-type: none"> Whilst the building does not qualify for formal listing it does qualify as a non-designated asset and should be registered as a Building of Local Interest. There is a Cambridgeshire Historic Environment List and the Victorian villa on the former site Hotel Felix site is listed there as 05482. <p>The scheme is contrary to NH/14, NH/15 and HQ/1</p> <p>The building is in good condition and would advocate for a sympathetic conversion rather than wholesale demolition.</p>	04.05.2021	<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>The existing building is not in a position to be converted to a care home, or to even return to use as a hotel.</p>
55	Cllr Bygott	<p>Hotel Felix is locally listed on the Cambridgeshire Historic Environment Record (CHER). After Girton College and the Parish Church it is the most substantial historical building in Girton.</p> <p>The applicant has not demonstrated that the demolition of the Victorian Villa is necessary to construct an 80 bed care home.</p> <p>It is not environmentally sustainable which applies to the Victorian building and modern extensions who have more than 60 years remaining of their design lives.</p> <p>The site lies outside the Girton village envelope and within the Cambridge green belt. It is the only substantial building located in the Girton Gap making a</p>	02.05.2021	<p>My evidence highlights that the building, recognised as a non-designated heritage asset of low significance, cannot be converted to operate as a care home.</p> <p>Additionally, the proposed scheme is highly sustainable in its design and would serve to provide a care home with limited impact upon the character of the open countryside</p>

		continuous connection between the village and the city.		and 'the Girton gap'.
56	2A Pepys Terrace, Impington, CB24 9NT	<p>The house captured the exuberance that characterised the Victorian Age with an interesting and unusual design combining Dutch gables with circular bow window. A sympathetic approach should be taken.</p> <p>The 170 year old Victorian house should be saved for this and future generations. Please reject this proposal to demolish the house.</p>	15.04.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.
57	2 Hicks Lane, Girton, CB3 OJS	<p>I am saddened to hear the news the developers with to demolish Hotel Felix. The house is a lovely example of Victorian architecture and should be retained for future generations to see and enjoy.</p> <p>The planners should reject this proposal and insist that the original building remains part of any future development of the site.</p>	12.04.2021	The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.
Interested Parties: Comments received following notification of appeal.				
58	Councillor Bygott	<p>Request that the Planning Inspectorate rejects this appeal.</p> <p>Despite some similarities between this case and the previous Stapleford appeal, there is a fundamental difference between the necessity of harm that must be done in order to achieve the benefits. The harm with Stapleford is merely the buildings presence and visibility. This case involves the total loss of a heritage asset, and this loss is not necessary. There is no reason why the proposal could not be designed around Howe</p>	06.12.2022	<p>Each proposal must be considered on its own merits. Hotel Felix, as it stands, cannot be converted to a care home, or return to operation as a hotel.</p> <p>The proposed scheme would not impact upon any nearby heritage asset to an unacceptable</p>

		<p>House in the same way the hotel had been.</p> <p>The appellant states that "No conservation areas or listed buildings would be unacceptably impacted upon by the proposed development." This is factually incorrect as Howe House is locally listed on the Cambridgeshire Historic Environment Record (CHER) with number 05482. Although not nationally listed, locally listed buildings should be conserved in a manner appropriate to their significance. The Victorian Society have added Howe House to their list of endangered Victorian country houses. Howe House should be seen as a building that has only very narrowly failed to qualify as a Grade II nationally listed building and one which will probably one day become listed. There are still a large number of unexplored possibilities that exist for how an 80 bed care home can be constructed on this site without the need to demolish Howe House.</p> <p>No objections to the proposed design other than the demolition of Howe House.</p>		<p>level. The building itself is considered to be of low significance.</p>
59	Ms Ann Rennie	<p>I'd like it noted that data of the planning application's public comment section indicates:</p> <p>a) At the Site Notice's "comment by" date of 24/05/2021, 55 comments had been submitted with 78% objecting to the proposal, the vast majority (70%) of whom are located within a 2-mile walking distance of the site</p>	05.12.2022	No comment.

(source: postcode analysis,
Google Maps Data);

b) Of the 12 submissions made in support of the application by that same date, zero (0%) originated from the same 2-mile walking distance of the site. The closest supporting submission came from the University Arms Hotel, Cambridge CB2 1AD who, per s 1.4 of the appellant's original Planning Statement [9] shares the same parent company as the planning applicant;

c) Several weeks after the Site Notice's "comment by" date of 24/05/2021, a further 25 comments were submitted which, collectively, showed a markedly different profile of support for the application at 84%, but still with barely any (just 8%) of those supporters originating from postcodes within the local site vicinity per the same 2-mile walking distance benchmark used above.

I believe this breakdown merits consideration in any assessment of the public interest and strength of local opposition to the proposal.

Robustness

Based on the time line and content of emails released on the planning portal website plus the prolonged concern felt by many local residents, the process for progressing this application showed room for improvement. Delays, possibly prompted by role changes, were likely compounded by the unprecedented upheavals in working practices that the Covid pandemic imposed on all of

		<p>us (indeed the appellant’s original Planning Statement s1.4 [9] relates the impact of Covid-19 directly to Hotel Felix’s closure). I have sympathy with frustration experienced by all parties.</p> <p>Fortunately, those days are in the past. It was reassuring to see the application dealt with so thoroughly in the Planning Committee meeting held on July 13, 2022. The matter was called in by a Councillor for Girton, recognising the need to bring focus, clarity and closure to a matter of such local significance. The meeting – broadcast live [10] - was attended by planning department representatives, council members and the appellant. It allowed for in-depth discussion of the key issues; opportunity for specific queries to be addressed by the appellant; well-rounded and participative debate, and culminated in a unanimous vote to refuse the application on multiple grounds.</p> <p>In gathering background information to a potential inquiry, I would recommend that viewing this meeting in its entirety would be a very worthwhile use of the Planning Inspectorate’s time.</p> <p>Thank you sincerely for considering these comments. I’m a great believer in transparency and inclusion within the planning process and am most grateful for the opportunity to participate.</p>		
60	Strutt & Parker (Sav Patel)	<p>Objection.</p> <p><u>Green belt</u></p> <p>The Planning committee considered evidence as being insufficient to demonstrate ‘very</p>	06.12.2022	My evidence outlines that the Very Special Circumstances would outweigh the harm of the inappropriate

		<p>special circumstances' when assessed against the harm identified and thus refused permission. This decision remains valid, specifically when considering the importance of the 'Girton Gap' as a green finger between the settlement of Girton and Cambridge. This is an important spatial feature which maintains the openness of the Cambridge Green Belt. The 'very special circumstances' identified by the appellant do not outweigh the harm resulting from the development. Conflicts with policy NH/9.</p> <p>Heritage Impact:</p> <p>The building is a well-preserved Victorian villa with substantial architectural and historic merit and positively contributes to the local area. The building would likely have been listed if previous incremental additional and alternations were not made. The appeal proposal should seek to reuse and make good the existing structures.</p> <p>The proposal fails to consider the desirability of sustaining and enhancing the existing buildings. The appellant has failed to properly take account of the positive contribution that the asset makes to the local community and has failed to design a scheme which makes a positive contribution to local character and distinctiveness. The scale and design of the appeal proposal has a Georgian character as opposed to a Victorian one and would appear unduly dominant both within the</p>	<p>harm (by definition) with the Green Belt.</p> <p>With regards to the heritage matters, the building, whilst standing, is not well standing and has been extended on numerous occasions, which have consequently impacted upon the fabric of the building. Furthermore, the building, when considered as a non-designated heritage asset, is of a low significance. Applying the para 203 test, the significance of loss of the building is low.</p> <p>The building is sustainably located to provide for a care home and located on previously developed land. There is a need, as outlined in my evidence, and as further expanded upon within the separate Proof of Evidence dedicated to 'need'.</p>
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		<p>site and from the surrounding landscape.</p> <p>Need:</p> <p>There is significant doubt about whether there is a need for this type of facility in this location. It has not been clearly demonstrated why the existing facilities and planned facilities (with consent) would not be sufficient to meet the care needs for the area. It is accepted that elderly care and, particularly, dementia care need will increase in the next few years as the population of Greater Cambridge increases. However, the need assessment appears to only review the existing supply provision of South Cambridgeshire and does not include the provision contained in Cambridge. The baseline of the existing supply is, therefore, skewed and gives a misleading outlook on the quantitative need.</p> <p>Whilst it is accepted that there is a national shortage of care home provision particularly within specialist care for dementia, it is vitally important that the local need is identified as this will vary.</p> <p>‘Very special circumstances’ do not exist for the appeal proposal. The appeal proposal would be inappropriate development in the Green Belt and the potential harm to the Green Belt is not clearly outweighed by other considerations.</p>		
61	Victorian Society	<p>Thank you for consulting the Victorian Society on this appeal following our objection to the refused application ref: 21/00953/FUL. We maintain this</p>		<p>The demolition of the building (a non-designated heritage asset of low significance)</p>

		objection and paragraph 203 of the NPPF remains a pertinent consideration. Demolition of the existing building would result in the complete loss of the significance of a building that should be considered a non-designated heritage asset, therefore a balanced judgement should refuse this appeal.		has been discussed throughout my evidence, especially in relation to the harm to heritage and the wider benefits of significance that would be captured under the scheme.
62	19 Richmond Road, Cambridge, CB4, 3PP	<p>Applied for rule 6 representation.</p> <p>Writes to uphold the decision to refuse planning permission. The committee was right to preserve the attractive architecturally interesting early Victorian house in excellent condition. Any demolition on this site would be very polluting. The trees and park land support wildlife and constitute a green area. The recent large housing area nearby makes it even more important to protect the natural resources on the site. The trees help to deaden the noise from the M11.</p> <p>Opposes any appeal that involves the demolition of the main block of the Felix and any trees in the grounds.</p>		<p>The demolition of the building (a non-designated heritage asset of low significance) has been considered in my evidence.</p> <p>Tree and landscaping impacts have been considered with the submission and within my evidence. No objections were received from the Council's Wildlife and Tree Officers.</p>

APPENDIX 4

APPELLANT STATEMENT



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1. PERSONAL INTRODUCTION

- 1.1 My Name is David Roe. I hold a Bachelor of Honours Degree in Urban Planning and Management. I am the Origination, Land and Planning Director for KYN, a care home operator specialising in elderly care.
- 1.2 I have been employed by KYN for over one year. Previously, I was employed by Signature Senior Lifestyle (“Signature”), another care home operator and developer, for over thirteen years. At Signature, my title was Head of Land and Planning and my role was to oversee the acquisition and planning process for all their new care homes, the majority in the south-east of England.
- 1.3 Prior to my work at Signature I was employed for 6 years by Churchill Retirement Living, a developer of age-restricted retirement communities. My title was Land Director, in charge of acquiring land in the south east for retirement schemes.
- 1.4 I have also worked for McCarthy & Stone as a Senior Land Buyer, again acquiring sites for retirement schemes in the south-east for over a year.
- 1.5 In my current role, I have been responsible for obtaining planning permission for the KYN care home on Allen Street in Kensington and sourcing new sites in other areas of London and the south-east. I am also part of a group of the KYN team who are responsible for developing the design and concept of KYN to be one of the best providers of residential, nursing and dementia care in the UK.
- 1.6 In my previous role for Signature I was responsible for obtaining planning permission for over 20 care home developments, the majority of their original portfolio, prior to them obtaining a number of care homes from another operator in late 2021.
- 1.7 KYN works closely with its consultant team and relies on their professional advice and expertise on design and technical matters. My evidence is confined to how KYN makes decisions to invest in particular locations and opportunities and how the KYN care homes will operate. I do not seek to provide technical evidence on the matters raised in this appeal, which are dealt with by the relevant members of KYN’s professional team. My focus is purely on operational matters.

2. KYN INTRODUCTION

- 2.1 KYN launched in 2019 with a vision to specialise in nursing and dementia care with a person-centred approach. KYN want our residents to feel pride in being part of the KYN community, and in the reassuring elegance of our interiors and our service ethic. We have redefined the usual, institutional, look and feel of care homes within the sector by working with specialist consultants and have developed an environment which is more elegant and domestic in its design. All of this comes together in carefully chosen settings to maximise our residents’ wellbeing.

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2.2 KYN currently own four sites with one operational (January 2023), two sites under construction, and a further two sites currently in planning. Other sites are being investigated.

3. THE KYN OFFERING

3.1 The following elements are central to the KYN offering:

- Registration of our homes with the Care Quality Commission as nursing homes;
- The provision of specialist healthcare facilities including for people living with dementia;
- Highly qualified and trained healthcare professionals employed directly by KYN;
- Individual homecare planning and support;
- Care and support from low to high dependency;
- 24-hour care and nursing provision;
- Other visiting healthcare specialists (including physiotherapy and podiatry);
- The opportunity for respite care and short stays;
- Specialist accommodation dedicated to the care of those living with dementia and other forms of memory impairment;
- The use of an industry-leading software system which escalates information immediately throughout the team to ensure the best outcomes for our residents. Our residents' wellbeing and safety is of paramount importance in all we do.
- KYN will use ground-breaking technology such as thermo and audio monitoring to help keep our residents safe. We are constantly researching the market for cutting-edge technology to further improve the well-being of our residents.

3.2 Covid-19 has taught us that these environments must be well designed and able to cope with infection control to save lives and improve the well-being of residents and their families. I expand on this in section 13 below.

3.3 Our approach to care means every floor has a modest number of households: a small number of like-minded residents, all of whom have their own bedrooms and en-suite bathrooms, with a shared lounge to enjoy together, as well as many communal areas. The benefits of a cosy, familiar environment with this smaller group of people are immediately recognisable; the opportunity for companionship and meaningful relationships is not only life-affirming but is proven to have a positive influence both physically and psychologically. Before each resident joins us, we take the time to understand their personality as well as their individual needs – a nuanced, two-way process that is continuously adapted and improved throughout their stay. We then create a bespoke care plan and assign each resident a dedicated nurse, senior carer, and support team who share their interests and can take care of them like family, supporting them as and when required or just being on hand to anticipate their needs before they arise.



4. TARGET MARKETS AND LOCATIONAL REQUIREMENTS

4.1 KYN chooses locations for new homes based on a variety of factors including:

- Supply and demand
- Quality of existing provision
- Age demographics
- Wealth
- Quality of local environment

4.2 Each new home represents a large investment by KYN which covers costs to acquire the land, obtain planning permission and build out prior to any income being generated. Making sure a site is suitable and viable is a prime objective.

4.3 Using several databases, KYN are able to identify at high level where demand for the KYN product is greatest. We also utilise the knowledge of external consultants such as Carterwood to analyse this data in more detail. Crucially, quality of provision is just as important as quantity as KYN believe all care home residents should have full access to their own private en-suite wetroom.

4.4 Through a network of agents and consultants we can investigate a number of opportunities within each of those markets and pass these on to our consultant team to advise on the site's development and planning potential. Key consultants would be the architects (Carless + Adams), planners (Bidwells), heritage (Bidwells) and landscape architects (LUC).

4.5 Following planning and design feedback from those consultants KYN would then assess the commercial viability of the scheme.

4.6 Providing the scheme is viable the consultant team are then engaged to progress more detailed due diligence on the site including site survey work, ground investigations, environmental, arboricultural, ecology, utility and legal reports.

4.7 If the above reports are acceptable then a scheme will be progressed for a pre-application planning meeting and the results of all these reported back to the KYN Board and investors.

4.8 A formal planning application would subsequently be submitted and pursued.

4.9 The Cambridge site is ideal for a KYN home. The site is situated within a built-up residential area with much new development going on in the immediate area. We foresee many residents being from the local area. It has good transport links and so is highly accessible, has plentiful mature landscaping and garden areas, and is previously developed.

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5. OPERATIONAL AND MANAGEMENT PLAN

- 5.1 KYN will operate and manage the care home, communal spaces, garden, kitchen, delivery of care, activities and maintenance.
- 5.2 It is anticipated that some external companies will be engaged to undertake tasks, such as refuse collection, but KYN will manage and oversee these.
- 5.3 KYN will prepare and serve all meals, drinks and light snacks to residents. Residents will be able to select from various menus and dine at any time which suits them. A room service menu will be available to all residents 24/7. This individualised, person-centred approach is far superior to that generally offered in other contemporary care home settings and our meal service will empower our residents with greater freedom and choice in relation to their diet.
- 5.4 Our culinary offering has been cultivated by a specialist in nutrition for the older person and to provide food which is both nutritious and appealing for our residents.
- 5.5 The following daily activities, organised by KYN's dedicated Life Enrichment and Well Being Team, will be provided for residents:
 - An engaged body is key to a healthy mind. We organise gentle, expert-led exercise classes from Pilates to Tai Chi, as well as therapeutic massage, craniosacral therapy, reflexology and acupuncture. We also arrange regular expeditions to historic palaces, gardens, Royal Parks, and rural beauty spots.
 - Our 'Soul' activities are designed to creatively inspire our residents. Examples include talking floral design workshops, art talks given by leading experts, and live opera, classical and contemporary concert screenings.
 - We offer a range of activities designed to stimulate the mind, dialogue and participation, including a Literature Appreciation Society, a Current Affairs Club, visits from school children and pet therapy.
- 5.6 A concierge service will operate during normal business hours 7 days a week, being 8 a.m. to 6 p.m.
- 5.7 Housekeeping services include cleaning of suites, changing of linen and towels and cleaning of all communal areas. All cleaning services and materials will be included in the weekly residential fee charged by KYN.

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6. COMMUNAL FACILITIES AND RESIDENTS' ACCOMODATION

- 6.1 The building includes extensive communal areas which will be open to residents:
- Great Room & Bar
 - Private Dining Room
 - Household Dining/Activity Rooms
 - Library
 - Cinema
 - Activity Room
 - Lobby
 - Spa Bathrooms
 - Communal Toilets
 - Quiet Rooms
 - Hair Salon
 - Therapy Rooms
 - Landscaped Gardens
- 6.2 The generous provision of communal spaces in our care home will exceed the requirements of the current industry standards, and will foster engagement and socializing among our residents and their guests.
- 6.3 The 'Great Room' is designed to be the heart of our home, where residents and their visitors can gather at our bar for a convivial drink or sit at a table to share a meal. The Great Room is our principal social space, and the setting for our cultural events and group activities.
- 6.4 Smaller communal dining and sitting areas will be situated throughout the home in the various households. These communal spaces are domestically scaled and decorated. These will provide alternative areas where residents who perhaps prefer a smaller, less busy environment to the Great Room can relax and dine. Residents will have access to snacks and drinks in these smaller communal spaces as well as a member of the hospitality team who will serve all guests in these spaces from our all-day dining menu.
- 6.5 Every KYN residence offers a fully stocked library. This will be thoughtfully stocked and continually refreshed by Heywood Hill, one of London's leading bookshops and the book curators to Her Late Majesty The Queen. This will combine literary classics with new publications and is the perfect setting for our weekly Literature Appreciation Society, with KYN happy to source personal favourites upon request.
- 6.6 Our Cinema will offer a welcoming, comfortable, and fully accessible environment in which our residents and guests may enjoy contemporary or classic films. We also screen performances from world-famous international theatres, opera houses, and other cultural venues.
- 6.7 A multi-purpose activity room will allow residents to engage in games, cooking, flower arranging, pottery or any other hobbies or activities they and the team are interested to participate in.

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- 6.8 Our fully accessible KYN spa and hairdressing facilities are available to all residents who are able to select from a full menu of holistic and alternative treatments including massages and manicures provided by our fully qualified spa team.
- 6.9 Our dementia households will also each have access to quiet rooms and namaste areas where their mental wellbeing will be prioritised daily.
- 6.10 Our beautifully designed gardens and terraces will offer residents an exquisite sensory experience and a connection with nature. These outdoor spaces create relaxing and tranquil surroundings in which to sit and enjoy or to participate in light gardening activities. Parking is situated well away from these areas for residents and level access is provided for walking. Existing mature trees will add to the landscaping and new semi-mature trees will be planted from day one so even the first residents will be able to appreciate them.
- 6.11 The care home has been meticulously designed and every detail scrutinised by our architects, interior designers and operations team to ensure that not only does the building look and feel exquisite, but that it is also highly functional and suited to the needs of our residents with varying medical needs and conditions.
- 6.12 The home will provide a total of 80 beautifully designed individual units of accommodation. Each suite will provide sufficient floor space to allow for any specialised equipment to meet the care requirements of every individual. Every suite will include a beautifully designed bespoke medical bed, a living area with seating and an ensuite bathroom which can be adapted for a person's individual accessibility requirements.
- 6.13 All areas of the home are specifically designed to accommodate those who are living with dementia, as reflected in the layout of small households comprising around 10 residents. Each household will have access to dining areas, communal lounges, activity areas and secure, outside spaces.
- 6.14 The aim of the KYN approach to dementia care is to be leaders in the industry by providing unparalleled, individualised, and innovative care to our residents living with dementia which enables them to be empowered and supported. There is the opportunity to be involved in university-led research initiatives should they wish. Our team members will receive extensive specialised training, as well as continuous support and guidance from our dementia specialist advisors who will continue to monitor best practice from other exemplar schemes around the world.
- 6.15 Carpets and furnishing within the building will be cleanable. A fresh air handling system will be incorporated into the home to remove any odours. Communal areas will also have air conditioning.
- 6.16 The building will have a fire sprinkler system and smoke extraction system to avoid the need for all residents to vacate the building should a fire break out. Horizontal evacuation will occur internally into separate fire compartments.

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7. TENURE

7.1 Each resident will occupy their room under licence with the fees payable monthly in advance. . The fees will include:

- All utilities including external telecommunication charges
- Furnishings within each room including linen
- All food offerings
- Daily housekeeping
- Activities arranged by the home
- Maintenance of the building
- Access to all communal areas and the landscaped gardens
- External and internal window cleaning
- Buildings insurance
- Minimum Care Package

8. ADMISSIONS

8.1 Prior to moving in, a mandatory, comprehensive process of multidisciplinary assessment is undertaken to identify the health and social requirements of the potential resident as well as to obtain information on individual preferences, focusing on how each individual aspires to live their life. This information is used to ascertain if KYN can meet and then plan for the individual's needs. Following admission, this information is then developed into a personalised care plan.

8.2 A care plan will be prepared for each resident to achieve specific outcomes. The care plans are constantly reviewed and evaluated by the care teams to ensure they can meet the changing needs of residents.

8.3 Our highly experienced and expertly trained staff will team up to undertake whatever is required to support the resident depending on their job roles and responsibilities. They will work with the resident throughout the day to assist them to achieve the desired outcomes and standards of living that they aspire to.

8.4 It is expected that the resident may become increasingly frail and unwell, and very sadly, at some point during their stay, end of life care is inevitable. The entire staff team, who will have undertaken specialist end-of-life care training, will be on hand to support the individual and their family through this journey and will be alerted to any decline in a resident's condition. Staff will provide spiritual, medical, emotional and psychological support based on an assessment of the person's changing needs.

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9. KYN CARE PACKAGE

- 9.1 KYN plans its services on the basis that residents will move into the building and then be likely to remain there for the remainder of their lives. With the extensive specialist nurse-led care on hand this should be the last move that the resident will have to make. 24 hour nursing care will be available along with specialist dementia care. It will be possible for a resident to receive 168 hours of nursing care a week (24hrs per day).
- 9.2 All of the accommodation will comply with regulation 15 of The Health and Social Care Act 2008 (Regulated Activities) Regulations 2010.
- 9.3 The minimum care package to be offered to a resident will be:
- Trained nursing and care staff available 24 hours a day.
 - Two well-being checks from a trained carer per day which might also include medication prompts
 - Ordering and management of any required medications.
 - Overseeing any required therapy
- 9.4 The minimum care level will comprise of one hour of care every day in addition to general housekeeping, mealtime assistance and activities provision.
- 9.5 Residents enter our home requiring ongoing multidisciplinary assessments, psychological support, varying levels of personal care and support to maintain their social needs. Continuous and comprehensive care planning is required with clear set objectives, together with care and intervention to ensure these goals are met. We provide our staff with the time and space to get to know each one of our residents' aspirations and care needs as if they were family members. Our staffing levels are set comparatively higher than most other care providers to ensure that our frail and vulnerable residents receive the highest levels of care and attention to allow them to live their best possible lives in comfort.
- 9.6 Treatments and care are delivered by our highly trained and specialist teams who have been recruited following a rigorous selection process. These roles include nurses, a dementia specialist Admiral Nurse (whose role is explained in more detail in the staffing section), care assistants, life enrichment and wellbeing coordinators, chiropodists and physiotherapists.
- 9.7 The majority of residents will come from the local area. Typically, residents moving into a care home tend to move from within a 1-5 mile radius of the care home, as residents seek to remain within their communities and close to family and friends. Most residents are expected to be females who are in their late 80's at admission and the average stay is expected to be 18 months until end-of-life. A smaller number of males than females generally move into a care home environment.

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- 9.8 Residents would be able to continue to be registered with their own local doctor although it is usual for KYN to enter into an agreement with a local practice and host a surgery one or two times a week within the building. A room has been allocated for this use which is a very efficient way for the doctors to operate and visit many residents in one place rather than travelling around the local area. The KYN nurses will also be able to assist and alleviate any calls to doctors and liaise with them on visiting days.
- 9.9 The KYN product is aimed at the private-pay care home market. Prior to any contracts being signed, potential residents/their representative will need to evidence 3-4 years capability of funding the total fee, of which year one funding must be available as cash. Fees will be structured to separate the accommodation and care element. The residential suite fee will be fixed with the care element determined by assessment of dependency.
- 9.10 We understand that a person's experience of dementia is highly individual. While a dementia diagnosis can mean a greater need for physical care, our focus is also on supporting our residents' emotional wellbeing, helping them maintain their identity, dignity, interests and independence and enabling continued engagement with their family. We do this by offering choice, respect, minimising medicinal intervention where possible and placing the emphasis on research-led care. We provide our residents living with dementia with enriching environments, in areas designed specifically for their needs with dedicated social spaces, outside terraces, and sensory gardens.
- 9.11 Specialist secure terraces are provided enabling residents living with dementia to have daily access to outside space.
- 9.12 With the online KYN Family Portal, family and friends can stay in touch as often as they choose. Whether communicating with the resident by phone, tablet or computer, it is easy to stay up to date with the meals chosen and activities enjoyed by the resident that day. Continual communication is one of our founding principles, and in addition to visits in person, our portal facilitates real-time, two-way communication between residents and their families, as well as encouraging regular communication and feedback with our nursing, management and leadership teams. Feedback from our residents and their families is invaluable to KYN and our open and transparent culture enables us to learn and grow. 'Sleeping Safe and Sound', our night-time acoustic monitoring system, employs the latest artificial intelligence and machine-learning to identify the tiniest disruption or changes to breathing patterns, and will instantly alert our care team to check in on our residents, typically before they have even stirred, to ensure their safety throughout the night. Additional thermal-imaging technology provides personal safety and independence by monitoring each resident's bedroom and alerting carers to any movement while automatically illuminating a pathway to assist with navigation and reduce any risk of injury. Our technology enhances standards of care so that teams are instantly alerted when assistance may be required and can therefore act before incidents occur. It provides detailed insights into our residents' health and wellbeing, enabling us to proactively adapt their personalised care plans at any given moment.

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9.13 Our homes reflect the very latest therapeutic approaches and clinical insights in providing care. From advanced care-planning technology to acoustic monitoring systems to ensure secure sleeping, the most pioneering and innovative developments are subtly embedded in the comforts of home.

10. STAFFING

10.1 KYN will employ an excellently resourced team to ensure that all of the care and emotional needs of our residents are anticipated and that they want for nothing. We anticipate that the majority of staff will come from a local catchment and use public transport or sustainable means of travel.

10.2 KYN will offer highly competitive pay rates and a best-in-class benefits and rewards package for all of our staff which we compare closely and continuously with packages offered by other care and hospitality providers.

10.3 A best-in-class training and continuous development framework for all our staff will ensure that they are always able to provide an exceptional standard of care for residents.

10.4 Other staff teams are required to ensure that all residents' needs are maintained. These include:

- administration staff,
- concierge,
- laundry and housekeeping staff,
- chefs and kitchen assistants,
- hospitality staff who work with the care staff to ensure our residents' wishes and needs are met,
- maintenance staff.

10.5 The complex care needs of our residents, and our elevated approach to care and hospitality, mean that the building will be continuously staffed 24 hours a day. The highest number of team members expected to be on shift at any one time is 35. This reduces to 8 during the night. The main shift changes will take place between 7am and 8:15am, and again between 5:30pm and 8:15pm with a few individual hospitality and ancillary staff arriving and departing outside of these times. As part of its exceptional staff benefits package, KYN will actively encourage its employees to travel to and from work using various travel initiatives to promote the use of public transport as well as offering a cycle-to-work scheme, freeing up the onsite car parking for guests and visiting professionals.

10.6 As the staff will be directly employed by KYN including nursing staff, and the residents will be self-funded, the proposed care home is expected to alleviate the burden on local and NHS services as residents can be cared for by KYN.

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- 10.7 The KYN Admiral Nurse is a qualified nurse with a professional specialism in dementia. While many care providers have dementia lead roles within their teams, such as dementia champions, who can offer valuable guidance to people living with dementia and their families, the KYN Admiral Nurse goes beyond advice. Their extensive clinical knowledge and experience means they can navigate the 'Dementia Pathway', managing complex needs and co-morbidities, providing advice on medication, changing symptoms and therapeutic interventions, offering life-changing support to families affected by dementia. Starting with a comprehensive care assessment of each family before the resident moves in, the KYN Admiral Nurse will build a picture of what help is needed, enabling them to create an individualised, flexible plan of care and support. The KYN Admiral Nurse can provide ongoing support for residents' families by providing them with stress management techniques and coping strategies as well as information about the condition and specialist education and training. Caring for residents at the end of their life is an integral aspect of care requiring careful co-ordination and the KYN Admiral Nurse can ensure the household teams are equipped with the expertise and knowledge to help residents and their families feel comfortable and safe ensuring a good death when the end of life approaches.
- 10.8 We also acknowledge that our team will themselves develop strong bonds with residents and, inevitably, this can lead to issues of grief and loss. End of life care is an emotional element of the role they will undertake, and together with the KYN Admiral Nurse, we will ensure support is available for everyone throughout the process by having an open and reflective culture throughout the home, providing opportunities for team members to come and talk about how they feel and allowing time for reflection to grieve the loss of residents.
- 10.9 Admiral Nurses' ongoing practice development is supported by the charity Dementia UK. They are supported by a Practice Development Admiral Nurse Consultant and will have access to the Admiral Nurse Academy. This is a dedicated central learning and development space for the Admiral Nurse community, giving each nurse a range of options to access ongoing professional development opportunities in various ways that best suit their individual learning needs. Admiral Nurses can choose from a range of opportunities that encourage innovation, career development, knowledge exchange, showcasing of evidence-based best practice and a space to connect with other Admiral Nurses. They will be enrolled into the DUK learning platform, through which they will have access to various learning modules, webinars, special interest groups, communities of practice and leadership programmes.
- 10.10 There will be one Admiral Nurse per home, supported by team members who will undertake a comprehensive programme of training to ensure knowledge acquisition and skill development depending on their role.

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11. VISITING

- 11.1 Whilst KYN has no set 'visiting hours,' it is expected that relatives and friends of the residents will usually visit between 10am and 8pm. An exception to this would be in the case that a resident is unwell or sadly approaching the end of their life. It is expected that in these instances close relatives may arrive and depart outside of these hours. Health professional visits, except for emergency situations, are normally expected within the hours of 9am and 5pm.

12. DELIVERIES

- 12.1 Waste collections will occur 2-3 days a week and will be contracted to collect between the hours of 7am and midday.
- 12.2 Our non-perishable goods will be delivered on a weekly basis whereas all fresh produce will be delivered 3 days a week, except for a small daily delivery of freshly baked items. Deliveries will occur between the hours of 7am and 5pm wherever possible

13. SAFETY OF OUR RESIDENTS

- 13.1 As part of our response to the Covid pandemic, we have introduced the following technology in our operations:
- Antibacterial room foggers to disinfect rooms on a regular basis and following any infection.
 - Thermo scanners at staff and main entrances. These will register the temperatures of all those who attend the home to monitor the risk of infection.
 - A fresh air handling system that changes the air in all areas of the home on a regular basis. This has the dual benefit of removing any odours associated with a care home environment, along with eradicating any disease particles. This air is treated and neutralised before being recycled back into the external environment.
- 13.2 Further to the above, KYN is investing heavily in technology to secure numerous other improvements to the monitoring of residents' safety. These include:
- Acoustic monitoring that tracks falls at night.
 - Resident care planning to track care provided and alert senior members if actions are outstanding.
 - Overbed sensors that light a pathway to the resident's bathroom if they need to use it overnight.
 - A pioneering approach to analysing data, whereby data is extracted from all systems into a central database, rather than kept in different systems used for different purposes, ensuring better distribution of information.

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14. SUMMARY

- 14.1 It is KYN's vision to create a best-in-class care home that focuses on nursing and dementia care with an individual person-centred approach. We consider that the site in Cambridge that is the subject of this appeal would be an ideal location for our endeavours.



BIDWELLS

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