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Planning and New Communities

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Date: 09/09/2020

Dear Rebecca,

Proposal: Construction of an 80 bed care home and 12no. assisted living/extra care apartments with associated car and cycle parking, landscaping and sustainable urban drainage following demolition of existing buildings

Location: Hotel Felix, Whitehouse Lane, Cambridge

Enquirer: Cassell Hotels (Cambridge) Ltd

Thank you for your enquiry. This letter is a response to your pre-application request and the meeting held seeking the pre-application views of the Local Planning Authority. The relevant information is set out below. Please be aware of the disclaimer at the end of this letter. If you have any questions relating to the advice given, please contact the case officer.

Recommendation

The pre-application enquiry was taken to the Planning Department's Case Management Meeting in which the proposal was discussed with Team Leaders and the Head of Development Control.

In my opinion, the proposal for the proposed care home may receive officer support if a formal application was submitted should further justification and consideration of the height, size, scale, footprint and location of the proposed new building be provided in terms of meeting Paragraph 145g of the National Planning Policy Framework. The proposal for the 12 no. extra care apartment building would not be supported by virtue of the proposal being contrary to Paragraph 145 of the National Planning Policy Framework and Policy NH/8 of the Local Plan.

In addition to the above regarding the principle of development, in my opinion the proposal would not be supported due to concerns regarding the proposed design, form, bulk, layout, appearance and visual prominence of the proposed buildings and car parking which would be contrary to Policy HQ/1 of the Local Plan which requires a high quality design and to preserve or enhance the character of the local area.

Site Constraints

The site lies outside of the Girton Village Development Framework and within the open countryside and Green Belt. The site has numerous Protected Trees within the site and on the boundaries. The site lies within Flood Zone 1 with public footpath 39/48 running north south

along Whitehouse Lane which also forms a cycle route to Darwin Green. Immediately to the east of the site lies the boundary of Cambridge City Council.

Planning History

S/1406/19/TP- Tree 1 Dead Yew with Ivy -Approved.

S/4502/17/FL- Proposed development and extension to provide new reception area and 16no. additional bedrooms-Approved.

S/0297/08/F- Extensions-Approved.

S/0817/00/F- Conversion Part Demolition and Extensions to Form 48 Bedroomed Hotel- Approved.

Planning Considerations

Principle of Development

The proposal will result in the loss of the existing hotel which is currently not open and replacement with an 80 bed care home and 10 assisted living/extra care apartments. As part of any application, you will need to provide details as to why the existing hotel is not currently open and could continue being used and the need for a care home of this scale and in this location. The proposal in principle is considered acceptable as there is a need in the District for care homes as detailed in the Housing for our future, Greater Cambridge Housing Strategy 2019-2023.

Loss of Employment

The proposal was considered in regard to the loss of the hotel use and replacement with the C2 use for a care home in relation to Policy E/14 of the Local Plan. As part of any application submitted, details in terms of the number of staff and jobs for the existing hotel and number of staff and jobs for the proposed care home would be required, however having discussed with the Policy Officer it is the view that the proposal would not need to be marketed for 12 months as the care home would also generate jobs which is a material consideration.

Green Belt Impact

The site lies fully within the Green Belt. The pre-application details that the proposal would fall under Paragraph 145 of the National Planning Policy Framework which states that the Local Planning Authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: (g) limited infilling or the partial or complete redevelopment of previously developed land whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development;
- or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

The proposed care home in my opinion could be considered as falling with Paragraph 145 of the NPPF, however in terms of meeting the requirement to not have a greater impact on the openness of the Green Belt than the existing development, you will need to strengthen your argument in relation to Green belt policy exception, as there it is acknowledged from the

submitted plans that parts of the proposed building are higher than the existing, with the footprint being slightly bigger and set further back into the site. Further work in terms of justification of the Green Belt and harm is required before the proposal could be supported. In terms of the extra care building, this would result in the construction of a new building in the Green Belt, being sited to the front of the proposed care home in a prominent location adjacent to Whitehouse Lane where the landscaping is limited and therefore it is visually prominent. No information has been submitted to demonstrate if this would fall into the exception categories of the NPPF. Currently the proposal would be considered a new building which is inappropriate in the Green Belt and would result in harm, therefore in my opinion, this would not be supported should an application be submitted as it would be contrary to Paragraph 145 of the National Planning Policy Framework and Policy NH/8 of the Local Plan.

In addition to the above, the pre-application proposal lacked detail in terms of the proposed parking, private amenity space and defensible space for this extra care building which would impact on the Green Belt and visual amenity of the area. Further work on the principle of the proposed extra care building would be required before more detailed analysis can be provided.

Policy NH/8 of the Local Plan states that any development proposals within the Green Belt must be located and designed so that they do not have an adverse effect on the rural character and openness of the Green Belt. Where development is permitted, landscaping conditions, together with a requirement that any planting is adequately maintained, will be attached to any planning permission in order to ensure that the impact on the Green Belt is mitigated.

Visual Amenity

The proposal should be of a high quality design and preserve or enhance the character of the local area in line with Policy HQ/1.

I would advise that you read the Urban Design Officers comments attached. There is concern regarding the design, form, bulk, layout and appearance of the proposals, which would not accord with Policy HQ/1 of the Local Plan.

Scale and Massing

The Urban Design Officer has commented that in terms of scale and massing, it is clear that the two proposed blocks would be materially larger than the one it replaces. The 2017 approval was supported on the basis that the footprint of the proposed hotel bedroom block did not significantly exceed that of the extension approved in the 2008 application (Ref: S/0297/08/F) and that the height is limited to 2 storeys to minimise impact on openness of the green belt and to respect the Victorian building and relates well to the 2008 extensions; whereas the current proposals (two care home blocks) would represent a significant increase both in footprint and building volume compared with that of the existing buildings combined with the 2017 approval.

The proposal would be accommodated in four long and continuous blocks with little relief both in built form and the ridge line. The extra care home would be arranged in a solid block located next to Whitehouse Lane, an area that is currently an open space that forms a separation between the built form and the road.

The proposed scale and massing of the proposed buildings are considered excessive and there is a need to reconsider the arrangement of the blocks to provide a less imposing volume and an appropriate footprint, taking into account views of the site from Whitehouse Lane, which will provide cycle and pedestrian access to the new Darwin Green development further down this road, and hence a more sensitive location due to an increased public use of this road from where the buildings would be visible. Currently, the proposals would fail to accord with

Paragraph 145 of the NPPF, and Policy HQ/1 (d) of the 'South Cambridgeshire Local Plan' (2018), which requires all new development to be compatible with its location and appropriate in terms of scale, density, mass, form, siting, design, proportion, materials, texture and colour in relation to the surrounding area.

It is considered that more work is undertaken to reconsider the proposed scale and massing of the building to ensure compliance with Policy HQ/1 of the Local Plan.

Siting and Layout

Concern is raised regarding the siting of both buildings, with the care home being too close to the northern boundary, with single aspect windows being affected by poor outlook, lack of daylight and overshadowing, creating a poor environment and amenity for residents. Please consider providing dual aspect rooms as single-aspect north facing units would provide poor amenity.

The proposed extra care building is sited in a prominent location, resulting in harm to the visual amenity of the area, rural character, prominent in the street scene and harm to the Green Belt.

Design and Appearance

Further work needs to be undertaken on the design and appearance of the proposal. The Urban Design Officer in their comments states that the scheme incorporates classical architectural language which would be at odds with its surroundings, creating accommodation with an institutional feel (not encouraged by the HAPPI guidelines). Recent developments in the area, e.g. Darwin Green, Eddington, etc. have adopted a contemporary architectural language using proportions and materials to reflect the local vernacular. Both the buildings in the 2008 and the 2017 approvals would present a more appropriate architectural style for this area and for the 21st century. The care home blocks could be arranged in a more dynamic built form with more setbacks and articulation to create a more residential feel.

In my opinion, the proposal is quite parking dominated as you enter the site. I would advise that you reconsider the visual impact of large amounts of car parking and break this up with small areas and creative use of hard and soft landscaping. The proposed parking would be harmful to the rural character of the area and Green Belt, being contrary to Policy HQ/1 of the Local Plan.

Amenity

Provision of internal and external private and public amenity space for residents is key to ensure a high quality design. Provision of garden space to ground floor units is supported. Provision of private external amenity space for upper floor units is required, this could be in the form of enclosed balconies/winter gardens. If this is not possible, justification would be required as to why this cannot be provided. Please see the Council's District Design Guide for details on provision of amenity.

Please consider The Housing our Ageing Population Panel for Innovation (HAPPI) Guide to the design of care homes based on 10 key design criteria. Please make reference to this in any submitted statements.

Historic Impact

Policy NH/14 of the Local Plan states that development proposals will be supported when 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: and

they create new high quality environments with a strong sense of place by responding to local heritage character including in innovative ways.

It is noted that the existing building given its age having been built in 1852 has a special architectural quality and interest. The proposal seeks to demolish the existing building and at the pre-application meeting it was stated by yourselves that retention of the existing building was considered however this was deemed not possible due to the existing building not being fit for purpose due to the room configurations, varying floor levels and narrow corridors. As part of any formal application submitted, I would advise that you detail why the existing building is not able to be reused so that Officers can understand the thought and design process having been undertaken. Part way through the pre-application process, the document titled Existing Building Review has been submitted which details a lot of this reasoning.

The Historic Building Officer has looked at your submitted Significant Assessment and commented that should a formal application be submitted, sufficient justification for demolition and replacement would need to be submitted for consideration as the historic element of the hotel does not appear to be beyond repair and reuse so this needs strong justification. The Historic Officer questioned whether retention of the historic part of the building and removal of the modern extensions and extension to the north has been considered as an option.

Neighbour Amenity

It is difficult to fully assess the impact of the proposals upon the neighbouring residential amenity, until a formal planning application has been submitted and the proposals can be viewed from the neighbouring properties and formally assessed. The adjoining neighbouring properties will be formally consulted should a formal application be submitted.

The site lies adjacent to the rear gardens of neighbouring properties to the north. Careful consideration of the impact of the proposal on these neighbours is required.

The proposal should not result in harm in terms of loss of light, loss of privacy or be visually overbearing to adjacent neighbouring properties.

Highway Safety & Parking Provision

I would advise that you submit a pre-application planning request to the Local Highway Authority at Cambridge County Council to gain their informal views of the proposal in regard to highway safety and traffic generation as a result of the proposal.

Policy TI/3 requires 1 car parking space per residential staff plus 1 car parking space per 3 bed spaces, with 1 cycle parking space per 2 staff working at the same time.

Car parking spaces should measure 2.5 metres by 5 metres, with 6 metres provided to allow for manoeuvring.

Trees and Landscape

Existing trees and hedgerows should be retained on the site where possible and proposed landscaping will need to be detailed in line with Policy HQ/1 and NH/4 of the Local Plan.

The proposal should not result in any harm to the protected trees which lie within and on the site boundary of the site.

An Arboricultural Impact Assessment would be required to be submitted as part of any formal planning application. The proposed siting of the new building and extra care building need to

be carefully considered in terms of the existing valued trees, not just the protected trees but any with a stature which contributes to overall canopy cover.

It is noted that the site is heavily screened along its boundaries, however there are noticeable gaps and during winter months in my opinion the screening is heavily reduced. I would encourage increased planting along the boundaries given the sensitivity of the site in the Green Belt.

Along Whitehouse Lane, the site is not well screened and it is considered that this boundary should be enhanced with landscaping given the footpath and cycle way is heavily used and allows public views of the site. In addition, the proposed frontage of the site is dominated by proposed parking and hard surface. This will need to be reconsidered to reduce the visual and landscape harm.

Details of boundary treatment including fencing and landscaping to enclose the site will need to be submitted as part of any application. The use of a picket fence to reduce the visual impact and allow views of the landscaping to be retained is encouraged.

As part of any submitted Landscape and Visual Impact Assessment for the proposal and impact on the landscape and Green Belt, you would be required to provide full, long distance views.

Ecology

The site has the potential for biodiversity. A Preliminary Ecological Appraisal (PEA) is required to be submitted as part any application. If further surveys are recommended within the PEA then these should be submitted as part of any application. The proposal in line with Policy N/4 of the Local Plan should preserve or enhance biodiversity and maintain, enhance, restore and add to biodiversity gain.

Contamination

Contamination surveys will be required to be submitted as part of any application, to demonstrate that the site can be made suitable for the proposed uses without posing unacceptable risks to receptors in line with Policy SC/11 of the Local Plan.

Archaeology

An Archaeology Survey would be required to be submitted as part of any application to demonstrate that the proposal would sustain and enhance any archaeological remains as part of Policy NH/14 of the Local Plan. The site forms part of an old roman road therefore this is particularly important.

Building for Life

The Council endorses "Building for Life 12 (BfL12)" as a means to assess the quality of homes and neighbourhoods. BfL12 is based on the National Planning Policy Framework and developers are encouraged to have due regard to the good practice it contains. Adherence to the recommendations in BfL12 is likely to result in applications being better designed and therefore more likely to be supported. A copy of this advice can be found at <https://www.scamb.gov.uk/content/apply-planning-permission> where guidance to accompany an application is provided.

Sustainability

Policy CC/1 of the Local Plan states that planning permission will only be granted for proposals that demonstrate and embed the principles of climate change mitigation and adaptation into developments. This is through submission of a Sustainability Statement.

Policy CC/3 requires new non-residential buildings of 1000m² or more to be required to reduce carbon emissions by a minimum of 10% through the use of on-site renewable energy and low carbon technology.

Policy CC/4 requires that non-residential developments must be accompanied by a water conservation strategy, which demonstrates a minimum water efficiency standard equivalent to the BRE AAM standard for 2 credits for water use levels unless demonstrated not practicable.

It is advised that you consider the proposal in terms of sustainability, the single aspect rooms in terms of overheating and climate control methods.

Parish Engagement

I would strongly advise that you speak with Girton Parish Council and local members regarding the proposed scheme to ascertain their views before submission of a formal planning application.

The building is iconic within Girton so local public consultation on the proposal is advised.

Design Enabling Panel

The Council has also established a Design Enabling Panel. Developers should be encouraged to refer major schemes or those of significance for the Panel to advise on its acceptability. Details and fees can be found at the District Councils Planning website.

Given the scale of the proposal and the sensitive location (Green Belt), it falls within the Council's Design Enabling Panel (DEP) referral criteria. It is strongly recommended that the scheme is presented to the Council's for an independent design review. This is to give members and officers the confidence that the design has gone through a robust design testing process.

Should you wish to submit an application, a list of information required to register it as a valid application can be found at appendix 1 below. Further detailed information to assist you with each particular requirement can be found on the Planning Portal website.

Please Note

Applicants are encouraged to submit planning applications through the national Planning Portal. This can be found using the following link <http://www.planningportal.gov.uk>

If you are submitting documents in CD form or in electronic format to be loaded into the Public Access System on our website, please note that in order to ensure complete compatibility with our on-line system, all documents must be under 5MB in size. They should also be correctly orientated and are either in Adobe pdf or Microsoft Word format.

Failure to do so, will delay validation and registration of your application.

Yours sincerely

Katie Christodoulides
Principal Planning Officer

Appendix 1 - List of information required to validate an application

Document	Required
Affordable Housing Statement	
Agricultural Dwellings	
Air Quality Assessment	
Biodiversity Survey and Report	x
Daylight / Sunlight Assessment	x
Design and Access Statement	x
Environmental Statement	
Flood Risk Assessment	x
Foul Sewage and Utilities Assessment	x
Heritage Statement (including Historical, Archaeological features and Scheduled Ancient Monuments)	x
Land Contamination Assessment	x
Landscaping Details	x
Lighting Assessment	x
Noise Assessment	x
Open Space Assessment	
Parking Provision	x
Photographs / Photomontages	x
Planning Obligation(s) / Draft Heads of Terms	
Planning Statement	x
Renewable Energy Statement	x
Structural Survey	x
Sustainability Statement and Health Impact Assessment	x
Telecommunication Development - Supplementary Information	
Town Centre Uses - Evidence to Accompany Applications	
Transport Assessment	x
Travel Plan	x
Tree Survey / Arboricultural Survey	x
Ventilation / Extraction Statement	x
Waste Design Guide Toolkit	x
Waste Management Audit	x
Water Conservation Audit and Strategy	x

Disclaimer:

- The above advice is given for purposes relating to the Town and Country Planning Acts and for no other Council function
- The advice is given without reference to statutory or other consultees, except where stated. The comments of such consultees may affect the advice given.
- The advice is given on the basis of the information that you have supplied. The Local Planning Authority will not be responsible for any errors resulting from inaccuracies in that information.
- The Local Planning Authority is required to perform within government targets with respect to processing planning applications. You are therefore advised to conclude your pre-application discussions before submitting a planning application.
- The advice given may subsequently be affected by external factors (e.g. new government guidance, local appeal decisions) which could result in a different view being subsequently put forward
- Planning policies are periodically reviewed and updated. The advice given relates to the policy framework at the time the advice was given.
- The Local Planning Authority seeks to provide the best advice possible on any enquiry received. However, the advice given does not bind the authority to any particular decision on any planning application that may subsequently be submitted which will be the subject of the publicity and consultation.
- Planning permission does not override the need to obtain any necessary approvals under the Building Regulations, Party Wall Act or any other relevant legislation. Separate approval may also be required in other areas, for example, restrictive covenants, shared agreements, easements, rights of way etc.
- Any advice given in relation to the planning history of the site, planning constraints or statutory designations does not constitute a formal response under the provisions of the Local Land Charges Act 1975.
- The Council positively encourages applicants to enter into pre-application discussions but if a major or minor application is submitted without such discussions, the Council may determine the application as submitted without post-submission discussions.
- The provisions of The Freedom of Information Act bind the Council, as a public authority, and therefore it should be presumed that information supplied to the Council is likely to be disclosable under the above Act. If you want information to remain confidential, you should state clearly why. Information sent to the Council "in confidence" may still be disclosable under the above Act. Before sending such information you are advised to take legal advice if there are fears that disclosure would prejudice you in some commercial way.