

Our Ref: 20/51426/PREAPP

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Dear Rebecca,

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL
Application for Pre-application advice

Site address: Hotel Felix Whitehouse Lane Cambridge Cambridgeshire

Your client:

Overall Response: **Unacceptable in principle or lacks essential information to make an assessment**

Proposed development

Demolition of existing buildings and construction of a 80 bed care home and 12no assisted living/extra care apartments and associated car and cycle parking, landscaping and sustainable urban drainage.

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. Immediate to the east of the site lies the boundary of Cambridge City Council.

Actions

I have visited the site and have sought specialist advice from the Conservation Officer, Urban Design Officer and Landscape Officer.

Pre-application Planning advice

I have assessed your pre-application proposal against relevant policies, the site history and from my understanding of the site constraints and its opportunities. I summarise my response to the key issues in the table below:

Issue	Summary response	RAG
Principle	Will require justification for loss of hotel and need for care home at application stage	
Loss of Employment	Will require justification at application stage	

Green Belt Impact	Concerns regarding proposed height and footprint being materially larger than existing	Red
Visual Impact	Need to reduce proposed footprint , enhance the design, reduce the height	Yellow
Residential amenity	Rooms to be provided with large windows for views	Green
Heritage	Justification required for loss of existing building	Yellow
Neighbour Amenity	To be fully assessed at application stage	Green
Highway Safety & Parking Provision	Requires a pre-application request with the Highway Authority	Green
Trees and Landscape	Boundary landscaping to be enhanced and within the car park.	Yellow
Ecology	Survey required at application stage	Yellow
Contamination	Survey required at application stage	Yellow
Archaeology	Survey required at application stage	Yellow
Building for Life	Details to be submitted at application stage	Yellow
Sustainability	Details to be submitted at application stage	Yellow

Green: Acceptable

Amber: Requires amendment, further information and/or site visit

Red: Unacceptable in principle or lacks essential information to make an assessment.

Detailed Response

Attached to this letter are the written responses of specialist officers where provided.

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. 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 informal 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 demonstrate that the proposed building's footprint is not significantly larger than the existing and the proposed height is higher than the existing. From the footprint calculations, I would advise the footprint is reduced further to ensure this. For the proposed height, concern is raised that the proposal would be disproportionately large in terms of height, this is evident in the east elevation outline structure which you have provided as part of the pre-application request. A large part of the existing building is single storey and the proposal would be significantly higher at two storey. To be able to consider this fully, details of all elevations of the existing and proposed sections would be required. Concern is that the proposed building is significantly larger in terms of height, mass and bulk than the existing.

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.

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.

Siting

The siting of the proposed care home would be largely in the same site as the existing building, if slightly to the west and further south allowing sufficient distance to provide a level of amenity to the adjacent residents and respect the Green Belt and views to and from the site.

The existing footprint measures 2,110 m² and in ground floor area 4,365m² with the proposal being 2,365m² and 4,595m² so an increase in 255m² and 230m². You will need to demonstrate how this increase does not have a greater impact on the openness of the Green Belt than the existing development.

It is encouraged that the proposal is further reduced in footprint and GIFA to respect the Green Belt setting.

The Urban Design Officer has suggested the following:

- 1) Look at reducing the size of the breakout spaces and the garden rooms and to create a larger setback from the main building line to help create more relief to the elevations.
- 2) Front elevation: Ground floor - reduce the width of the kitchen, entrance/foyer, manager office; First floor – reduce the width of the hair and beauty, the circulation space between the gym and the arts and hobbies room, the consult room.

Appearance

The Urban Design Officer has commented that the scheme incorporates classical architectural language and imposing built form and facades, which would be at odds with its surroundings, further justifications are required to demonstrate the proposed architectural language.

It is advised that to further simplify the elevational treatment and try to incorporate elements of the existing Victorian building into the elevational treatment in order to better relate the proposed architecture to the existing site context. It is important to ensure that the proposed building does not give an institutional feel (not encouraged by the HAPPI guidelines). In addition, the fan light

and the portico proposed to the front elevation, as well as the round windows proposed to the wide elevations could perhaps be omitted or replaced by simpler elements.

The elevations still appear too long and lack relief. Introducing more set back and variation to the design would create a more dynamic built form and a more varied ridgeline and design may help alleviate this issue.

Submission of detailed CGI's would help at application stage.

It would be useful to view the proposed elevations in its context, i.e. longer street elevations, this is to demonstrate that the proposed building is sited appropriately and would have regard to its surrounding landscape (e.g. TPO trees) and site boundary.

The revised elevations use glazed elements (which would accommodate the breakout spaces and a garden room) break up the long elevations. To sure a clean and elegant finish, it is important to ensure that these glazed elements are sufficiently set back from the main facades and their roofs are carefully designed to create a contemporary feel. Special attention should be paid to the glazing to the roof terraces to create a more 'open' feel. Perhaps trellis with climbing plants can be introduced to this area to enliven this space.

Scale and Massing

As previously detailed in the Green Belt section of this letter, there are concerns regarding the proposed height, size, scale, mass and bulk of the proposed building in relation to the existing building which is partly two storey and partly single storey. The east section plan submitted, demonstrates a significant height difference between the existing and proposed buildings, which would have a detrimental impact on the visual amenity, Green Belt and character of the area, resulting in harm.

Design

The Urban Design Officer at the meeting advised that the access route from Whitehouse Land to the care home would benefit from having a less straight configuration to create a less formal entry route.

The Urban Design Officer has requested that you explore the concept of providing a clear visual link from the entrance/foyer area and the Great Room (east wing), through to the internal courtyard, then to the Garden Room (west wing) and the landscape beyond. This would allow views to the greenery along the "spine" of the development, creating a sense of openness and as a reference to the Green Belt context. It is advised that the existing sculpture of the dog can be retained and placed in the centre of the internal courtyard as a reference point to the site's history and to enhance this landscaped courtyard.

The roof design should be considered to allow opportunities for renewable energy measures, such as PV panels, Ground/Air source heat pumps, grey water recycling and vegetable gardens.

Visual Impact Assessment

The application would be required to have a visual impact assessment submitted due to the Green Belt location, in which detailed views to and from the site from key vantage points such as public rights of way to the east and north of the site and views of the site from Whitehouse Land which provide cycle and pedestrian access to Darwin Green would be required.

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/terraces to ground floor units is supported.

It is noted that private external amenity space for upper floor units is not able to be provided given the nature of the residents. Please provide this justification as part of any application. Please see

the Council's District Design Guide for details on provision of amenity.

It is important that all the rooms are provided with pleasant views and have adequate levels of daylight. Single-aspect north-facing units are not generally supported. In the revised design, both the Site Plan (Drawing no. A-846 Rev P9) and Proposed Elevations (Drawing no. A846-Rev P8) indicate that the north-facing units, i.e. Ground floor Bedroom no. 14-20, 21-29, and First floor Bedroom no. 21-30, 13-20 would be provided with large windows and private terraces. This would help provide these units with adequate light and a positive outlook. Subject to further information being provided, e.g. internal elevations, sections showing floor to ceiling height with dimensions of window sills, a limited number of single-aspect north-facing units in the proposed care home would be acceptable. There is a need to ensure that the Bedroom no. 20 and 40 (both ground and first floor) are not overshadowed by the first-floor terrace.

The document demonstrating the assessment of the quality of the proposed home design against the ten principles of the Housing our Ageing Population Panel for Innovation (HAPPI) was useful and this should be provided as part of any submitted planning documents.

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. As part of this pre-application request, the document titled Existing Building Review has been submitted which details a lot of this reasoning and analysis of the layout of the existing hotel building to meet the requirements of the care facilities.

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.

It is considered that the demolition of the Victorian building is the least preferable option from a design perspective, the Existing Building Review provides details of why this building cannot be reused which have been considered.

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 positioning of the building further away to the south of this boundary is encouraged.

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.

The proposal details that 30 car parking spaces are proposed and would be sited to the north east of the site. This would need to be considered in regard to proposed staff levels and bed spaces.

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.

The Landscape Officer advised at the meeting that all existing boundary landscaping and planting should be enhanced. This is particularly important for the northern boundary with interplanting and more trees to ensure the boundary is robust and sufficiently screened for privacy of the adjacent neighbours.

It was commented that proposed tree planting to the car park, along the boundary and surrounding the building would add to the landscape and visual amenity of the area.

The Landscape Officer at the meeting questioned the need for the central courtyard to form small spaces rather than a large communal space, however you advised that this design was appropriate.

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.scams.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, any 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.

Conclusion

There are still concerns with the proposal as it stands regarding the proposed footprint, size, scale, height, mass and bulk of the proposed building in regard to the existing building and the impact on the Green Belt and visual amenity of the area, in regard to the National Planning Policy Framework and Policies HQ/1, NH/8 and NH/9 of the South Cambridgeshire Local Plan.

Additional Information

Occupiers of neighbouring properties have not been formally consulted. Any advice provided in relation to residential amenity impact is therefore subject to change following a consideration of any consultation responses received as part of any planning application.

Where a site visit has not taken place the comments provided may not address all relevant planning issues. As part of the consideration of any planning application, the case officer will visit the site.

It is strongly advised that you discuss the proposal with any adjacent neighbours to resolve any issues that they may have prior to an application being made. This is good practice and can avoid unnecessary delay in processing a planning application.

This pre-application advice is given for purposes relating to the Town and Country Planning Acts and for no other Council function and is given without reference to statutory or other consultees, except where stated. The Local Planning Authority will not be responsible for any errors resulting from inaccuracies in that information. The advice relates to the policy framework at the time the advice is given which may subsequently be affected by external factors (e.g. new government guidance, local appeal decisions, policy review). The Local Planning Authority seeks to provide the best advice possible on any enquiry received, however, the advice is without prejudice and does not bind the authority to any particular decision on any planning application that may subsequently be submitted which will be the subject of publicity and consultation.

Further advice

If you require further advice please contact me using the details above. The pre-application charging scheme allows for additional advice including from specialist officers to be provided on an hourly rate basis as a follow-up to this pre-application response. We would normally expect you to provide a written commitment to meet these costs in advance and then invoice you for the necessary payment after any subsequent advice is given. Any significant change to the proposal may require a further pre-application submission.

Yours faithfully

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