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Our Ref: 221902

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By Email: Aisosa.charles@planninginspectorate.gov.uk

Dear Aisosa,

Re: Refused planning application ref: 21/00953/FUL for the Demolition of existing buildings and erection of a care home (Use Class C2), Former Hotel Felix, Whitehouse Lane, Girton, Cambridgeshire CB3 0LX.
Planning Appeal ref: APP/W0530/W22/3307903

I write on behalf of my client in connection to the above refused planning application for a new care home and to make representations to the Appeal Inspector in **objection** to the appeal scheme.

The planning application (21/00953/FUL) was refused by South Cambridgeshire District Council's Planning Committee on 13th July 2022. The committee resolved to overturn the officer's subjective recommendation of approval and the application was refused on three grounds, each of which are summarised below:

- The site is located outside of the development framework boundary of Girton and within the countryside and Cambridge Green Belt. The proposed development would, therefore, represent inappropriate development that is harmful to the Green Belt, and as such would be contrary to national and local plan policies;
- 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, and the overall benefits of the scheme would not outweigh the harm identified;
- The application failed to provide 'very special circumstances' and demonstrate why the harm by reason of inappropriate development in the Green Belt and other harm identified was outweighed by any benefits.

In reviewing the local policy, matters such as the Green Belt, heritage and conservation and design and scale will be discussed to demonstrate the inappropriateness of the proposed development and lack of 'very special circumstances'.

The current development plan consists of the adopted South Cambridgeshire District Council Local Plan (2018) and Policies Map (2018). The Council is currently in the process of preparing a new joint Local Plan with Cambridge City for the Greater Cambridge area. The emerging Local Plan contains draft policies which indicates the direction of future growth; these have been consulted on and so have some limited weight.

Development in the Countryside:

Policy S/7 (Development Framework) states that only allocations within Neighbourhood Plans and development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be in the countryside will be permitted. Therefore, any development outside of these parameters will not be permitted. The site is located outside the settlement boundary of Girton and is therefore in the countryside. Supporting para 2.50 states it is necessary to ensure the countryside is protected from gradual encroachment on the edge of a village and help guard against incremental growth. Girton is identified as a Minor Rural Centre in Policy S/9, which states that residential development will be permitted within the development framework.

The appeal site is located outside the settlement framework of Girton and is an important gap between Girton and Cambridge. Whilst the appeal proposal is to redevelop an existing site, the scale of the redevelopment would encroach into this important gap and significantly diminish its importance. If any development is accepted then it should seek to retain as much of the original building as possible, which makes a positive contribution to the local area and has heritage significance in terms of its architecture and historic interest. The appeal proposal would represent a significant intervention over and above the existing built development on the site and would be a dominant intrusion into the countryside. The appeal proposal would therefore fail to comply with the countryside protection policies S/7 and S/9 of the Local Plan.

Green Belt:

The Site is located within the Cambridge Green Belt. As paragraph 2.29 of the South Cambridgeshire Local Plan (Adopted 2018) explains, the Cambridge Green Belt aims to prevent urban sprawl by keeping land permanently open to preserve the setting and special character of historic towns. Policy S/4 of the Local Plan states that new development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework (NPPF). Chapter 13 of the NPPF explains that no development is permitted to be built within the Green Belt unless under 'very special circumstances'. Para 148 of the NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.

At the Planning Committee meeting held on 13th July 2022, a series of 'very special circumstances' were set out in favour of the proposed development, such as a need for specialist housing, additional jobs and re-use of previously developed land. The committee considered these overall as being insufficient to demonstrate 'very special circumstances' when assessed against the harm identified and thus resolved to refuse permission.

This decision remains valid, specifically when considering the importance of the 'Girton Gap': an area of undeveloped land within the Green Belt which provides an important gap within the Green Belt. The retention of the 'Girton Gap' as a green finger between the settlement of Girton and Cambridge is an important spatial feature which maintains the openness of the Cambridge Green Belt. The gap also serves to protect the purposes of the Green Belt. Para 138 of the NPPF identifies the five purposes for the Green Belt, all of which are of relevance. However, further to this, supporting para 2.30 of Local Plan policy S/4 identifies three established purposes of the Cambridge Green Belt which adds further localised considerations. It is robustly considered that the appeal proposal fails to comply with the majority of the purposes for the Green Belt and

the 'very special circumstances' identified by the appellant do not outweigh the harm that would result from the development.

The 'Girton Gap' is an important feature within the Cambridge Green Belt. It provides spatial separation between the village of Girton and city of Cambridge. Whilst the Hotel Felix complex is situated within the gap, it is the only built form (aside from the farm buildings to the field to the north). Therefore, the redevelopment of the site to provide a care home would lead to the deterioration of the gap and compromise its ability to be maintained by virtue of allowing development. As can be seen from the existing site, the original hotel building has been extended incrementally, creating the opportunity for future development such as the appeal proposal to exploit the site and further merge Girton with Cambridge. It is important that the two distinct areas are kept separate in order to preserve the unique character of Cambridge (and Girton as a small village on the outskirts of Cambridge) and prevent communities from merging into one another. The merger of towns and deterrence of urban sprawl are fundamental safeguards of the purposes of the Green Belt. The site forms part of an important 'green finger' separating Girton from the city and the appeal proposal would further link the two and significantly dilute the separation over and above the existing. It is therefore essential that the gap is robustly maintained to avoid coalescing the village and the city.

The appeal proposal would also have a greater impact on the openness of the Green Belt than the existing development and as such conflicts with policy NH/9 (Redevelopment of Previously Developed Sites and Infilling in the Green Belt) of the Local Plan. The increased bulk of the appeal proposal and dilution of the important Girton Gap would significantly affect the essential characteristics of the Green Belt in terms of its openness and permanence.

The proposal would therefore conflict with Green Belt purposes a) and b) in para 138 of the NPPF and all the purposes of the Cambridge Green Belt in policy S/4 of the Local Plan.

Heritage Impact:

Policy NH/14: Heritage Asset states that development proposals will be supported when they sustain and enhance the significance of heritage assets including their setting. Supporting para 6.45 also states that the district's character is largely shaped by its heritage including that of its much-loved historic villages and countryside. Villages stand out in the landscape with a variety of forms, which respond to their location. Para 6.46 further states that the challenges facing the historic environment include preserving the district's special rural character and scale of buildings, the degree of change generated by prosperity and the impact of intensive agriculture on historic landscapes. On identifying viable reuse, para 6.51 states that finding viable uses which sustain rather than compromise the significance of historic buildings is fundamental to conservation.

The original building is a well-preserved Victorian villa built in 1852. Its front elevation, with ornate ridge detailing and projecting central curved bay facing towards Huntingdon Road, has substantial architectural and historic merit and makes a positive contribution to the site and local area. Were it not for the incremental additions and internal alterations, the original building would likely have been protected through being listed. The DCMS considers the building to be an "attractive suburban villa" and references the notable southern elevation and terrace. It is not surprising therefore that the appeal proposal has received objections from Girton Parish Council, the Council's Conservation Team, the Victorian Society, Councillors and local residents. The main thrust of these objections is to protest the loss of an important local and historic feature within the countryside landscape between Girton and Cambridge. The original building has local interest and, whilst not listed, is identified as a non-designated heritage asset. Para 203 states for non-designated heritage assets the effects of an application on the significance of should be taken into account when determine the application. A

balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

The significance of the heritage asset is in its architectural and historic interest and the positive contribution that it has to the local area. Therefore whilst the original building is not listed, it has significant local heritage value and interest, and therefore the scale of its complete loss, as the poorly conceived appeal proposal, would result in substantial harm to the locality. There is also significant opposition to the appeal proposal from local people and the redevelopment of the site to provide a care facility would not provide sufficient public benefits to outweigh the loss, particularly in terms of loss of an important historic and architecturally important feature within the local landscape. The appeal proposal should seek to re-use and make good the existing structures.

Paragraph 197 of the NPPF states that when determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets; the positive contribution that the conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness. The appeal proposal is considered to fail to adhere to any of these considerations. The appeal proposal fails to properly consider the desirability of sustaining and enhancing the existing buildings, particularly the original building. The appellant has failed to properly take account of the positive contribution that the non-designated heritage asset makes to the local community and, as such, has failed to design a scheme which makes a positive contribution to local character and distinctiveness.

The appeal proposal would result in a monolithic and monotone structure that fails to respond to the local context of the area and the architectural interest of the original building. 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 site and from the surrounding landscape. The proposed building would further exacerbate the link between Girton and the city and dilute the important role that the 'Girton Gap' plays in separating the two.

The appeal to demolish this historic building and replace it with a larger pastiche building should not be supported as it would not comply with policy NH/2. The appeal proposal overall is not compliant with objectives in the NPPF and policies NH/9 and NH/14 of the Local Plan.

Need care:

There is significant doubt about whether there is actually any need for this type of facility in this location, given that there are other existing facilities nearby and planned provisions, which have been consented but not built out. The appellant's own need statement demonstrates this. 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. Para 14.1 of the assessment states "*we have assessed supply based upon market standard bedspaces within South Cambridgeshire District Council...*" The baseline of the existing supply is, therefore, skewed and gives a misleading outlook on the quantitative need.

In terms of the proposed need, the assessment states that "*The biggest challenge in predicting future need is trying to map the changing market and future patterns of need...*" Therefore, it is considered that the need statement is not particularly robust and does not make a clear case for additional care need in this part of Greater Cambridge. This is an issue that has been picked up by the Policy Team in their consultation

comments. The Council's own Housing Needs for Specific Groups study uses different methodology to that in the appellant's need assessment but broadly arrives at a similar result in terms of shortfall of bedspaces by 2024. However, the Policy Team highlight that the County Council has undertaken their own analysis, which finds much lower need. The County Council will look to prioritise supporting people to stay in their own homes and support a mixed market approach offering a range of housing options. The County Council project a need for an additional 124 bedspaces in South Cambridgeshire from 2020 to 2036 but consider that as there have already been 210 permitted there is no further need.

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. Using the national care shortage as the basis for justifying additional care without properly considering the local need has the potential to result in an over-proliferation of care home provision in this area, which could lead to an over-supply. Furthermore, the NHS (Cambridgeshire and Peterborough Clinical Commissioning Group) has provided detailed comments on the workforce demands based upon a comparable facility nearby and concluded that *"Serving the Primary Care needs of another 80 bed care home within their Practice boundary is simply not tenable, as the above figures demonstrate. Particularly if the care home is a dementia specialist centre whereby the needs of the residents will be even greater and place even more pressure on the Practice"* [my underlining]. Therefore, even from a practice workforce perspective, meeting the demands of this care home will be a significant challenge, and add to the existing challenges the practice has to deal with.

Considering the above, there is not clear evidence of need for a new care home in this location, particularly in view of the several other care homes within the local area and the planned provision coming forward.

In these terms, therefore, it has been demonstrated that '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. On this basis, the appeal proposal would be contrary to the objectives of the NPPF and relevant/main policies contained in South Cambridgeshire District Council Local Plan for protecting the Green Belt from inappropriate development, and should be dismissed without delay.

Yours sincerely



Sav Patel
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