Representations to Greater Cambridge Local Plan

On behalf of Trinity College Cambridge

The Case for Cambridge Science Park North

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Contents

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1. Introduction

1.1. This report has been prepared by DP9 and Sphere25 on behalf of Trinity College Cambridge (TCC) as the principal owner and custodian of the Cambridge Science Park (CSP) in support of representations to the Greater Cambridge Local Plan (Regulation 18) First Proposals Document (JLP).

1.2. The exclusion of a draft allocation for CSPN at this stage is regrettable and it is TCC's view that following a review of both the supporting evidence bases for the JLP and North East Cambridge Action Plan (NECAAP), that neither documents current aims are deliverable without CSPN being allocated.

1.3. The JLP also does not identify how Cambridge can meet its future job targets or identified need, particularly in the mid-tech sector. To achieve the transport, employment and socio-economic aims of the JLP, and separately the NECAAP, a radical reappraisal and interrogation of its supporting evidence base is required.

1.4. The evidence base is inconsistent and in places flawed. An allocation for CSPN provides the supporting policy and development management framework to recognise and harness CSP's continued evolution and regional role as a significant contributor to employment, research and development for the Cambridge and UK economy. Additionally, an allocation for CSPN provides the capacity to deliver on the JLP's stated employment aims. Its allocation is also an exciting opportunity to keep Cambridge at the forefront of innovation, securing a mid-tech future for Cambridge, the region, and the UK as a Scientific Superpower.

1.5. This document sets out the exceptional circumstances for development at Cambridge Science Park North. It is submitted alongside a series of complimentary reports and technical notes as follows:

- Local Plan First Approach Economic Response – Volterra (December 2021)
- Landscape and Green Belt Study – The Landscape Partnership (Updated December 2021)
- Cambridge Science Park North Prospectus – Perkins&Will (December 2021)
  Mobility Note – Vectos (December 2021)
- CSPN Local Plan Representations: Policy S/NEC: Northeast Cambridge – Vectos (December 2021)

1.6. This document sets out the context and relationship with Cambridge Science Park; the identified need to provide for mid-tech employment space; a review of the site appraisal methodology and outcome for CSPN; an overview of the proposed North East Cambridge Policy, and why without CSPN this is undeliverable and finally a summary of the exceptional circumstances. The document also includes a review of the HELAA and Sustainability Appraisal as they relate to CSPN.

2. Cambridge Science Park

2.1. Integral to Cambridge's success as a globally renowned centre of scientific excellence is Cambridge Science Park.

2.2. Cambridge Science Park was founded in 1970 as the first science park in Europe by Trinity College Cambridge. The site established a benchmark for the future at that time, based on the then-government's ambitions to forge a future on the '*white heat of the scientific revolution*'.

2.3. Fifty years on, we are in a new era of national focus on research, science, and innovation as the driver for economic success in the UK. Allied to this, is the growing understanding that mature science parks benefit enormously from adjacent development hubs to ensure research products can be tested for manufacture ready to market. Indeed, the emerging JLP makes space for this aligned to bio-sciences, but largely ignores the needs of the wider R&D sector which build the diversity and success of the Cambridge economy.

2.4. Cambridge Science Park today comprises 150 acres, 1.9million ft^2 of predominantly research and development lab space, supporting the employment of approximately 7,500 people over 130 companies including AstraZeneca, Napp Pharmaceuticals and Toshiba.

Figure 1: Cambridge Science Park Today, Perkins + Will 2020

2.5. As an employment destination of local, regional, and national importance, TCC would like it on record that it has deep concerns relating to Cambridge Science Park's removal as an Employment Allocation within the JLP. This point is made in separate representations focused on Cambridge Science Park as an existing employment site.

2.6. In summary, the key points made are as follows:

- The plan is not positively prepared, ignoring one of Greater Cambridges largest employment sites.
- The emerging JLP is not in accordance with National Policy which seeks (as a minimum) to support economic growth.
- The JLP conflates the delivery of new homes reliant on the DCO with the ongoing growth of employment associated with the existing Cambridge Science Park cluster.
- Transport capacity is a key constraint to the delivery of the NECAAP and to date this issue remains unresolved.

2.7. Bizarrely, the Jobs Topic Paper[1] makes no explicit reference to Cambridge Science Park as an employment location of scale (only passing reference as a location for a hotel); but makes specific reference to Cambridge Biomedical Campus, Wellcome Trust Genome Campus, Granta Park and Babraham Research Campus amongst many other smaller employment locations.

2.8. To provide planning officers with an understanding of the scale and role of Cambridge Science Park, a comparison is provided in **Appendix A** which shows Cambridge Science Park and a selection of sites which are given prominence through explicit reference in the local plan with their comparative size, number of employees and 5km[2] radius to the development strategy proposed within the emerging JLP.

2.9. Cambridge Science Park is comparable in size and employee figures to the four key Science Parks identified within the JLP. In fact, as stands today Cambridge Science Park is one of the largest which makes the lack of any reference in the emerging JLP questionable.

2.10. It is difficult to comprehend how an emerging JLP that does not recognise one of Greater Cambridges largest employment sites has been positively prepared and justified. Indeed, the emerging JLP makes no attempt to quantify or spatially map the major employment locations across the Greater Cambridge area.

2.11. CSP is located within closer proximity to a higher volume of the key housing growth areas illustrated within the JLP. Page 38 of the JLP suggests that the JLP strategy has been strongly influenced by
'reducing climate impacts through compact development located to connect homes and jobs where active and sustainable travel can be maximised.'

2.12. However, without an exercise mapping the key employment destinations it is difficult to see how this strategy has been developed.

2.13. Page 39 of the JLP goes on to state that '*We also have evidence that locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help*

[1] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/TPJobsAug21v2Nov21.pdf

[2] Cycling rates for travel to work do not decline until the trip is longer than 5km (3.1 miles), Cambridge Insight: https://cambridgeshireinsight.org.uk/wp-content/uploads/2017/08/Transport-and-Health-JSNA-2015-Active-Transport.pdf

reduce commuting and associated carbon emissions and congestion.' It therefore logically follows that providing additional jobs close to existing and proposed homes in the north of Cambridge utilising the existing and planned sustainable transport measures would be equivalent.

2.14. Cambridge Science Park is the most sustainable location for further employment growth within Greater Cambridge, **therefore the emerging JLP should reference the continued importance of Cambridge Science Park as an employment site.**

2.15. We raise the following questions on the emerging JLP:

- The evidence base still references the importance of Cambridge Science Park, ongoing demand and the need for intensification, however the text within the emerging JLP does not reflect the evidence base, nor the existing Policy position with regard to Cambridge Science Park. Therefore, what is the rationale behind the removal of Policy E/1 supporting the continued development of the Cambridge Cluster of high technology research and development companies at Cambridge Science Park, and ultimately the removal of any reference at all to Cambridge Science Park within the emerging Local Plan?

- The First Proposals document removes any reference to Cambridge Science Park as a location for continued employment development, and instead refers to the North East Cambridge Area Action Plan area being able to accommodate 'around 15,000 new jobs (with only some of those anticipated during the Local Plan Period). What evidence supports this statement?

- The draft North East Cambridge Area Action Plan published in 2020 referred to 20,000 new jobs being created in the North East Cambridge Area Action Plan area. Within the plan period up to 2040, the draft confirmed that 'The phasing of business floorspace is anticipated to be fairly continuous throughout the plan period. This is at odds with the statement within the First Proposals local plan.

- The draft North East Cambridge Area Action Plan also confirmed that Cambridge Science Park will be 'the principle source of business space development in North East Cambridge.' This is not reflected within the First Proposals document and should be.

Suggested Policy Wording.

2.16. Given the recognition of all other comparable science parks and employment destinations within the emerging JLP, and the recognition that North East Cambridge is the most sustainable location for development in Greater Cambridge.

2.17. The emerging JLP should therefore include the following policy:

Policy S/CSP: New Employment Provision – Cambridge Science Park
Appropriate proposals for employment development and redevelopment on Cambridge Science Park (as defined on the Policies Map) will be supported, where they enable the continued development of the Cambridge Cluster of high technology research and development companies.

3. Mid-Tech Space – A Clear Identifiable Need

3.1. One of CSP's key differentiators when compared to other science and technology Parks is the diversity of its occupiers in terms of sector, size, nationality and age. Diversity is important because scientific disciplines that were once separate and distinct are now converging. Rather than build in-house capabilities beyond their core area of expertise, companies are sourcing innovation from businesses with complementary competencies. Proximity to relevant scientific expertise is therefore an important factor in a company's choice of location. Increasingly, science-based companies want to be part of a dynamic, multi-sectoral "ecosystem". Cambridge Science Park offers this level of diversity and therefore provides unrivalled opportunities for companies to form cross-sector collaborations.

3.2. It is notable that this ethos operating at scale within Cambridge Science Park is promoted by the Life Sciences sites which are afforded an allocation within the emerging JLP, but the existing operation of this at CSP is ignored.

3.3. Trinity College Cambridge through establishing Cambridge Science Park over 50 years ago embraced a concept that would change the hi-tech sector in Cambridge, the UK and beyond. Trinity College's commitment to science 'building a better world' by providing a world class home to research intensive companies is again at the forefront of government thinking, which recognises that innovation is key to the challenges facing the economy and in addressing climate change challenges[3].

3.4. Innovation involves a high degree of risk; in particular, the risk that products may not perform in the real world in the same way they did in the laboratory or workshop. Often products need to be re-designed, retested and adapted to meet the needs of the market. Moreover, in order to stay ahead of their competitors, research intensive companies need to implement a programme of continuous innovation.

3.5. Already, a number of technology companies manufacture close to their research base where changes in design can easily be implemented and new product ideas rapidly prototyped and tested. This is becoming an increasing trend particularly in the case of the low-volume, high value products such as robotics, medical devices, electronics, and batteries - areas where Cambridge leads the world.

3.6. CSPN is uniquely placed to build upon the success of the Cambridge Science Park and meet this growing demand, providing tailored space and facilities, address rising rents and demand for floorspace and providing a world-leading centre of excellence for manufacturing and development.

[3] Build Back Better: Our plan for growth, March 2021, Ten Point Plan for a Green Industrial Revolution, November 2020

Economic Innovation Supported by Policy

3.7. Building Back Better – Our Plan for Growth was published by HM Government in March 2021. In the strategy, commitments are made to:
"make our country a science and technology superpower and the best possible place to create green jobs".

3.8. The strategy, produced by the Department for Business, Energy and Industry seeks to:
"Build a stronger, greener future by fighting coronavirus, tackling climate change, unleashing innovation and making the UK a great place to work and do business."

3.9. The strategy also includes commitments to deliver growth on the pillars of infrastructure, skills, and innovation, supporting the transition to Net Zero – all of which are complementary to the ambitions of Cambridge Science Park North.

3.10. HM Government's Innovation Strategy, launched in July 2021 highlights that:
"The different elements that characterise innovation – discovery, invention, development, and adoption – cannot be readily and cleanly separated"

3.11. Under the strategy's Pillar 3: Institutions & Places, the strategy states:
"We will ensure our research, development & innovation institutions serve the needs of businesses and places across the UK."

3.12. Furthermore, the Government's innovation strategy highlights that the UK is starting to fall behind its international competitors for the following reasons:

- Business investment in R&D has fallen relative to our international peers.
- There are low rates of technology adoption by firms that lead to underutilised knowledge.
- We are at risk of a 'brain drain', the UK being a net exporter of talent.
- Our workforce has skills gaps in some key areas which are at risk of growing in the coming years.
- Our regulatory system often favours incumbent businesses over innovative new one.

3.13. Given that the ambition for the expansion of the world-famous Cambridge Science Park, (populated by research companies), to provide adjacent space for the development of mid-tech for manufacture is not seeking public funding but will be created on land owned by Trinity College and will be built by Trinity College, the national economic case for supporting the expansion is compelling.

3.14. Ultimately however it is the local community of Cambridge and the Greater Cambridge region that will directly and immediately benefit from the establishment of Cambridge Science Park North. Through this expansion businesses will have a home in Cambridge that will enable them to create a wide range of jobs at various skills levels and ancillary opportunities, improve transit links whilst providing enhanced public access to green space with improved biodiversity in the location.

Identified Need

3.15. The city of Cambridge is an economic powerhouse with a world-leading reputation for research and innovation. The high-value economic activity taking place across the city delivers productivity and prosperity locally, regionally and across the UK.

3.16. However, with rents continuing to rise, demand substantially outstripping available space at the existing Cambridge Science Park, and no opportunity to introduce new manufacturing facilities to co-locate with research, a complementary expansion is now required – **Cambridge Science Park North**.

3.17. The emerging JLP suggests that Cambridge is forecast to grow by an additional 58,500 jobs between 2020 and 2041 and demand from businesses to access science parks, with the opportunities presented by research and industrial knowledge, is placing significant pressure on available floorspace. However, these requirements are not recognised or addressed in the draft GCLP. Importantly, the existing and potential value of the mid-tech sector to Cambridge is also not acknowledged within the document.

3.18. The mid-tech sector comprises of, having, or designating technology that is relatively sophisticated but not the most advanced (contrasted with high-tech, low-tech).

3.19. As part of our Call for Sites submission we provided a **2019 report by Volterra (resubmitted for ease of reference)**, which clearly set out the floorspace requirements of mid-tech occupiers, to 2031 as ranging between c. 80,000 - 450,000 sqm of new floorspace, or between 250 and 1,000 new jobs per year.

3.20. A further **Technical Note by Volterra** is submitted with these representations setting out our feedback on the methodology and why we believe that the emerging mid-tech sector is not appropriately considered or acknowledged in these requirements. This leads to a substantial under-provision of space which, if taken forward, will result in constraints on employment growth in the future. The importance of mid-tech and why it is not covered in the Employment Land Review are summarised as follows:

- **Mid-tech is not included in the 'key sectors' that are used to forecast employment need as these identify previously growing sectors, rather than future growth sectors;**

- **The densities and use classes used to estimate future floorspace need may not be appropriate for the mid-tech sector.**

3.21. **We would urge Greater Cambridge to review the evidence with regard to mid-tech needs, and to engage with the Cambridge Science Park team to understand the needs of the sector.**

3.22. We raise the following questions on the emerging JLP:

3.23. The ELR relies on a set of employment forecasts for 2020-2041 based on several options for historic data and different modelling approaches. The employment forecasts are based upon various sources of historic data that give a wide range of estimates for Greater Cambridge

employment (140,000 – 209,000). **Can relying on historic employment to predict future floorspace requirements be considered accurate given the constraints of building in Cambridge & the volatility of these employment estimates?**

3.24. The ELR doesn't take the full estimate of the growth in the key sectors, instead it takes more conservative scenarios from it stating that it "*appears unrealistic in the context of historic performance and given the physical constraints of the urban fabric and tight boundaries of the City*". In reality, it should be an ambition to help these key sectors reach their potential, so **is this estimation a hindrance on growth?**

3.25. Whilst some discussion of sectors is undertaken and sector-specific growth rates applied, this does not include any assessment of mid-tech, despite our evidence showing that the need for this sector is significant and increasing. **How were the high growth sectors defined? And has any attempt been made to understand the definition of and potential for growth in the mid-tech sector and, if not, why not?**

3.26. The ELR acknowledges that floorspace densities are changing, and different firms or types of jobs have different spatial needs even within given sectors. They consider a combination of the latest HCA employment densities guidance and local stakeholder consultations in arriving at densities used. In reality though, the only use class where the density used really varies significantly from HCA guidance is the B1b density, where guidance says 40-60 sqm per job and the ELR assumes 28 sqm per job. Given the B1b floorspace makes up 78% of future need, this is clearly an absolutely fundamental assumption, for which no justification is given. **Can you provide more detail on the stakeholders engaged with please, and to what extent these were focused just on life sciences and whether it took into consideration any occupier needs within mid-tech or specifically engagement with any CSP tenants?**

3.27. Whilst the ELR acknowledges the difficulties in matching the growth sectors to SIC codes and to employment use classes, "*activities within these clusters do not fit neatly in SIC codes*", it then goes on to use SIC codes in order to project growth of high growing sectors in Greater Cambridge. This results in the demand for different types of B1 class uses. This is absolutely critical to the resulting quantum of employment land needed, but the ELR itself acknowledges is subject to considerable uncertainty. **What is your response on this, and its potential limiting impact upon growth, given how critical it is to the resulting employment growth forecasts and resulting land allocations?**

3.28. The ELR assumes that future need will be met by the existing development pipeline, assuming that all the current pipeline will be delivered. This pipeline is very dependent upon the Genome Campus coming forward in full, at which site it is unclear which types of B1 space are planned to be delivered, which could again have huge implications for the extent to which this delivers space for the anticipated growth sectors. This fails to recognise that growth at Genome Campus will only meet the niche area of genome science.

3.29. **What consideration have you given to this reliance and do you consider it reasonable for a robust plan?**

3.30. **Why has there been no consideration of mid-tech as a growth sector?** Had this been done, it would be clear that (i) it has a large growth potential and (ii) it would benefit from clustering

with CSP. Our own analysis of the sectors which make up mid-tech highlights a very significant concentration of mid-tech in the local area. **Why is this not acknowledged or given any weight?**

4. The Appraisal of CSPN

Site Selection

4.1. The evidence base prepared for the emerging JLP appears to inform the development of policy for individual site selection. The general principles of the evidence base, broadly where to build and how much to build, are applied to the consideration of individual sites to assess whether they should be taken forward in site allocations.

4.2. The employment evidence base is spread across a number of documents, including a jobs topic paper, strategy topic paper, housing and employment relationships report, economic evidence base study, strategic spatial options appraisal and employment supplement. These documents often refer to other documents rather than setting out the employment strategy succinctly in one place.

4.3. This makes following the rationale for the employment proposals difficult, indeed the plan makers appear to be repeating the document trails which led to the following comment being made by the Inspector for the previous Local Plan:
"Following a further request the Councils provided a more detailed Note of where this information could be found. The Note provides more detailed references across a significant number of documents, but this kind of paper trail does not aid clear comprehension"[4]

4.4. TCC continues to offer support to Planning Officers in terms of meeting with our economic advisors to assist in the production of a robust economic evidence base for the JLP.

4.5. One element of the assessment of site suitability is the Housing and Economic Land Availability Assessment (HELAA), which considers whether individual sites are suitable on the basis of planning, transport and environmental factors.

HELAA

4.6. One element of the assessment of site suitability is the Housing and Economic Land Availability Assessment (HELAA), which considers whether individual sites are suitable on the basis of planning, transport and environmental factors.

4.7. The HELAA assesses sites submitted as part of the Call for Sites process in terms of their suitability, availability and achievability.

4.8. Sites have been assessed using a methodology that incorporated a 'Red, Amber, Green' (RAG) scoring system. The assessment largely seems to have been carried out using judgement although it is acknowledged that specialist consultees were used.

4.9. Sites were deemed to be 'unsuitable' if they were assessed as 'Red' against any of the criteria used, were deemed to be 'unavailable' where there was no evidence that the site was available and were deemed to be 'unachievable' where it was considered there was no reasonable prospect that the site could be developed.

[4] https://www.scambs.gov.uk/media/9238/letter-from-inspectors-to-councils-preliminary-conclusions-200515.pdf

4.10. CSPN scores green on availability and achievability but is given a red RAG rating with regard to suitability. However, a review of the HELAA results for the other large employment sites identifies that there are other sites scoring similarly that are taken forward for Green Belt release (see **Appendix B**).

4.11. Interrogating the two red scores for CSPN these relate to Landscape and the Strategic Highways Impact only.

4.12. With regard to the Landscape and Townscape criteria, the following observations are made:

- The TPO identified on the site is questioned, and it is assumed this relates to land to be retained within the Green Belt. Regardless there is a commitment to retain trees and provide substantial areas of new tree planting within and beyond the site.

- It is noted that Landscape Officers were consulted, however the commentary would suggest that they were not provided with the detailed assessment material provided with our call for sites submission. Reference is made to generic landscape designations, but no reference is made to the specific landscape characteristics of the site.

- The **TLP Report submitted with the Call for sites (and resubmitted for ease of reference)** describes the local landscape features together with mitigation.

- The commentary for the HELAA suggests that a red rating meant the proposal would result in significant harm that could not be reasonably mitigated, however this appears to fail to recognise that half of the site is to be retained within the Green Belt. The HELAA also comments that mitigation could be *'enough room for adequate boundary buffering … enough room for tree planting within the site'* both of which are demonstrable at CSPN.

4.13. Moving to the Strategic Highways Impact, the site was scored as a Red due to its location within Highways England Zone 3 - A14 CNB. The reason given for this is that there is "no capacity for growth" and that "sites would need to ensure no net increase in vehicles trips on the Strategic Road Network."

4.14. The A14 Cambridge Northern Bypass and the M11 North were the only zones considered to have no capacity for growth. This appears to be an overly simplistic assessment to assume that there can be no real future development in these areas when there could be development outside of these zones which will generate trips through these zones.

4.15. This is especially true when considering that the A14 Cambridge to Huntingdon improvement scheme has relatively recently been completed and is now open to traffic and there are plans to improve capacity on the A10. Therefore, **the reasons why there is no further capacity for growth on the A14 is not entirely clear.**

4.16. In addition, sites such as the core site within the NEC AAP has no opportunity to reduce existing trips or a baseline against which development might not exceed. As such, applying such restriction to sites would make anything other than the intensification of the existing site unachievable.

4.17. It is noted that the NEC AAP area also scored red for this criteria and is being carried forward as a key policy within the emerging JLP. The commentary clearly states 'no capacity for growth'. This appears at odds with the application of HELAA results for the Cambridge Urban Area, indeed the Strategy Topic Paper states that '*Where sites were identified in the HELAA as either not suitable, not available or not achievable these sites have not been subject to appraisal, as they are not considered reasonable options'*.[5]

4.18. Regardless, CSP has committed to no net increase in parking across CSP and CSPN and therefore a policy commitment to this would achieve the necessary mitigation to overcome this red rating. Furthermore the CSPN vision is focused on sustainable transport solutions, achieving a step change in mode share to this employment location and ultimately addressing issue head on.

Sustainability Appraisal

4.19. The Greater Cambridge Sustainability Appraisal (SA) forms part of the evidence base for the emerging Greater Cambridge Local Plan.

4.20. The SA appraises the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development. The Development Strategy Topic Paper sets out the strategy for taking sites through to SA, which relates to their strategic location.

4.21. For edge of Cambridge Green Belt sites such as CSPN the HELAA process identified that most sites would result in significant landscape impacts (as detailed above). However, the edge of Cambridge performs well in many aspects of sustainability due to its proximity to the jobs, homes and infrastructure of the city. All individual sites on the edge of Cambridge including those in the green belt were subject to site specific consideration for allocation, and for sustainability appraisal.

4.22. A summary of the outcome of the SA appraisal is set out below.

1 Housing	2 Access	3 Social inclusion and equalities	4 Health	5 Biodiversity and Geodiversity	6 Landscape and townscape	7 Historic Environment	8 Use of land	9 Mineral	10 Water	11 Adaptation to climate change	12 Climate change mitigation	13 Air pollution	14 Economy	15 Employment
0	++	0	++	-?	--?	-?	--	--?	0	-	++	-	++	++

Table 1: CSPN Sustainability Appraisal

4.23. Again, the results for CSPN are similar to the Green Belt sites proposed for release, and with regard to certain criteria actually performs better.

4.24. It is noted that the sustainability appraisal relating to sites including Cambridge Biomedical Campus, Babraham Research Institute and Wellcome Genome Trust includes policy

[5] P435 – Development Strategy Topic Paper.

interventions which then improve the sustainability appraisal score once these are translated into planning policy appraisals.

4.25. For example, the application of criteria 6 (Landscape and Townscape) at Cambridge Biomedical Campus amended a HELAA assessment which identified the potential the site extension would have resulting in a significant adverse effect on the landscape to a policy intervention moving the rating to a positive via a comprehensive landscaping plan.

4.26. Comprehensive landscaping is proposed at CSPN which similarly would result in a movement in sustainability appraisal scoring.

Consideration of CSPN in site selection

4.27. What is not entirely clear from the somewhat laborious audit trail through the evidence base, is what research has been undertaken to justify the conclusion "*Our research has not highlighted sufficient need for the scale of development proposed at Cambridge Science Park North*"?[6]
Does this research go beyond the Employment Land Review and can this be signposted?

4.28. Has any consideration been made as to whether proposed sites can address socio-economic challenges within Greater Cambridge? For example, the proposed development of the Cambridge Regional College is a clear advantage of the skills and training benefits of Cambridge Science Park North, but no mention to this impact is given in policy.

4.29. Does the site allocation methodology consider other characteristics of site development put forward within site submissions? For example, the submission for CSPN clearly stated that the development would generate no additional vehicle trips, and yet CSPN is ranked as red under the HELAA assessment because there is no capacity for growth on the Strategic Road Network.

4.30. The importance of clusters seems to be acknowledged, but the contribution of CSP has been underplayed in favour of other clusters drawn from historic evidence on the existing economic advantages of Greater Cambridge. Should Greater Cambridge not be forward looking to identify sectors with potential to drive future growth such as mid-tech?

Exceptional circumstances

4.31. **What economic evidence is relied upon to conclude that exceptional circumstances do exist for greenbelt release at sites Brabham Research Campus, Cambridge Biomedical Campus Extension and Cambridge Biomedical Campus but not at CSPN?** We have seen nothing which justifies these in favour of CSPN, apart from the identification of life sciences as a growth sector, and the material to defend this position seems limited. Is there further evidence we have not seen which was submitted with the site submissions or subsequently undertaken by Greater Cambridge in terms of the relative growth potential or economic importance of life sciences and/or mid tech?

[6] Taken from the response to economic case of CSPN within the 2021 Strategy Topic Paper App. D1 - Greater CambridgeLP Strategy Topic Paper- Revised 10.9.21.pdf (greatercambridgeplanning.org)

4.32. For example Babraham Research Campus on page 155 "*The Campus has a distinct and unique set of characteristics, not available anywhere else at other research facilities in the sub-region, and has benefited from significant public investment. The campus is important to the development of UK life sciences, in particular supporting start-up and scale-up bioscience companies. Whilst it would be possible to identify sites elsewhere outside the Green Belt, the opportunities provided by the Campus would not be supported. The Campus has been subject to significant public investment and plays a key role in the life sciences sector*." CSP has no public funding on a conservative estimate employs three times as many people as Babraham.

4.33. Therefore, exactly the same could be said of CSP/CSPN but in the context of mid-tech rather than life sciences. CSP plays a recognised role in the clustering and growth of high-tech firms, supporting start-ups and scale-up businesses, but now needs space to enable mid-tech firms to continue to innovate and grow here. Whilst this growth could occur to a lesser scale on alternative sites outside the Green Belt, this would not benefit from the clustering with CSP and therefore the growth would be lower and less productive (the opportunities provided by a co-located Campus). CSP has, and CSPN will, be subject to significant *private sector* investment (just as valuable – arguably more so – than public investment) which in turn will deliver benefits to the public sector, such as playing a crucial role in delivering the sustainable travel objectives of the area. **Why are these arguments recognised in the context of other Green Belt sites but not CSPN?**

5. Exceptional Circumstances

5.1. The principle of the establishment, protection and alteration of Green Belt boundaries is set out at within the National Planning Policy Framework ('NPPF')[7], which states:

> *"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."*

5.2. The exceptional circumstances policy test that needs to be met for land to be released from the Green Belt should be assessed through the Local Plan process. The NPPF provides that the test is considered met if there is a need for development that cannot be met elsewhere. Local planning authorities must be able to demonstrate that they have fully examined all other reasonable options, including making use of suitable brownfield sites for meeting the identified need for development before seeking to release Green Belt land.

5.3. The NPPF is clear that Green Belt locations can be reviewed in response to the need for sustainable development, and where it has been shown that it is necessary to release Green Belt land for development, authorities must have regard to the need to promote to sustainable patterns of development:

> *"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport."*[8]

5.4. The NPPF goes on the state that where it has been shown that it is necessary to release Green Belt land for development, plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

The need for mid-tech land

5.5. As set out above, there is a clear and defined need for mid-tech land within Greater Cambridge that is not provided for within the emerging Local Plan.

5.6. Volterra have undertaken a scenario-based forecasting exercise for mid-tech in this location. Three scenarios are presented within the report: – central trend based, low (constrained by space), and high growth (facilitated by a supportive cluster-based growth node). Considered

[7] Paragraph 136
[8] Paragraph 138 NPPF

over the plan period to 2031, this would equate to growth in mid-tech jobs of between 250 and 1,000 each year, or between 3,200 – 18,100 to 2031. Based on the floorspace requirements of skilled manufacturing and development occupiers, this would be expected to require c. 80,000 - 450,000 sqm of new floorspace to 2031.

5.7. These forecasts deliberately present a very large range. There are many factors which contribute to whether the area can achieve the high growth scenario. If growth is not enabled and is instead constrained to meet the poorest of past performing levels, less space will be required. Linked to this however considerably fewer jobs opportunities are generated, along with their associated economic value and export base.

5.8. If, however, growth is prioritised and planned, the past performance, speciality and evidence of strong clusters, provides confidence that significant growth could be achieved above and beyond the central scenario.

The need for mid-tech land at Cambridge Science Park North

5.9. Cambridge Science Park is famous worldwide for its research & development, as well as innovation, and has gone from strength to strength in accommodating research-intensive businesses ranging from spin-outs from the University of Cambridge to multinational companies. The worrying lack of reference to the existing Cambridge Science Park is referenced within separate representations, however an emerging Local Plan based on a HELAA which fails to recognise one of the largest employment sites within Greater Cambridge is highlighted again.

5.10. Volterra have produced economic evidence supporting the fact that CSP has a clear speciality in high and mid tech employment. This evidence (as previously submitted) goes on to detail the economic importance of this, not just to the Cambridge economy, but also the UK economy as a whole. The evidence goes on to highlight the importance of high value / low volume products to assist in the reduction of the UK's balance of trade deficit.

5.11. CSP is reaching its developable limits within the immediate future and therefore the economic importance of Cambridge Science Park North (CSPN) in delivering mid-tech / skilled manufacturing and development land for both the Cambridge and UK economy are key considerations. The Volterra evidence described the shrinking availability of physical space for the "making" side of the research and development industry. Agent's evidence maintains the demand for space within Cambridge[9], despite the unprecedented period, traditional industrial occupiers within the Cambridgeshire market are competing with high tech uses, with supply remaining constrained and demand outstripping supply.

5.12. The need for this type of employment space is demonstrated. What is equally apparent is a shortage of suitable buildings and / or sites elsewhere. Future growth within CSP will be focused on renewal and densification of existing plots. Demand for 'build on' space for products developed within the R&D businesses on CSP is high.

[9] https://www.bidwells.co.uk/insights-and-research/our-view-on-cambridgeshire-industrial-summer-2020/

5.13. The Development Strategy Topic Paper[10] suggests that the ELR does

"not single out a specific need for mid-tech space on the scale that is proposed at Cambridge Science Park North."

5.14. The commentary then goes on to state that this '*type of hybrid space*' is proposed at the Bourn Quarter and exists at Cambridge Research Park and Evolution Business Park. However the following sentence then confirms that the mid-tech Enterprise Units at Cambridge Research Park are now all fully let. We also understand that Evolution Business Park is fully built out and let.

5.15. The Topic Paper goes on to suggest that *Our research has not highlighted sufficient need for the scale of development proposed at Cambridge Science Park North therefore it is considered that there is no justification for exceptional circumstances required for Green Belt release.*

5.16. However, our evidence suggests a need for between 80,000 - 450,000 sqm of new floorspace required to 2031, therefore the 26,757sqm proposed at the Bourn Quarter does not fulfil this requirement. Furthermore this is a much more sustainable location, aligned to an existing successful Science Park and under the long term custodianship of an experienced and invested landowner. Put simply, an allocation here will be a more successful location.

5.17. At Cambridge Science Park North new skilled manufacturing employment opportunities would be created to support the growth of exportable high-value, low-volume science and technology product development.

5.18. The impending relocation of Marshalls and uncertainty with regard to timescales, amplifies the need for investment in this type of job and employment growth within the Cambridge economy. Providing more balanced employment opportunities in skilled manufacturing in the short term, whilst providing longer term economic growth.

Proximity to CSP and long term custodianship

5.19. Global trend analysis shows that in order for these developments to be operating at their economic peak, they need to be physically located in close proximity to where the research and development is taking place. Cambridge Science Park North provides an opportunity for this locational advantage to be maximised via active and sustainable modes of transport.

5.20. Evidence to date would suggest that establishing standalone sites further out of the City do not work, indeed if sites are not available the choice to locate to alternative premises offering research and development facilities linked to skilled manufacturing widens globally rather than just to alternative locations within the UK. If we do not provide these facilities in Cambridge, these companies may choose to locate operations outside of the UK altogether.

5.21. For similar reasons dispersal of these types of employment land does not work and are likely to result in change of use applications in future.

[10] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/TPStrategyAug21v3Nov21_0.pdf

5.22. Not only is there a high prevalence of these sectors at Cambridge Science Park, it is also home to some of the more exportable subsectors within this employment sector. Cambridge Science Park has considerably higher exportability than the national average in both high-tech and mid-tech sectors. South Cambridgeshire is similarly above the national average, although less evidently than Cambridge Science Park itself.

5.23. This is an indicator that even within the productive sectors of high-tech and mid-tech, Cambridge Science Park exhibits a greater concentration of highly exportable industries than the average for these already very productive sectors. This further indicates
(a) that the sectors which choose to locate at Cambridge Science Park are highly valuable with high rates of exports, and
(b) there is an environment at Cambridge Science Park which engenders productivity.

5.24. The evidence base appears to be written to meet the outcomes rather than to inform the process. For example, the figures and evidence set out within the Employment Land and Economic Development document clearly illustrate the Cambridge Science Park cluster, for example Figure 24 clearly illustrates the cluster of activity at Cambridge Science Park:

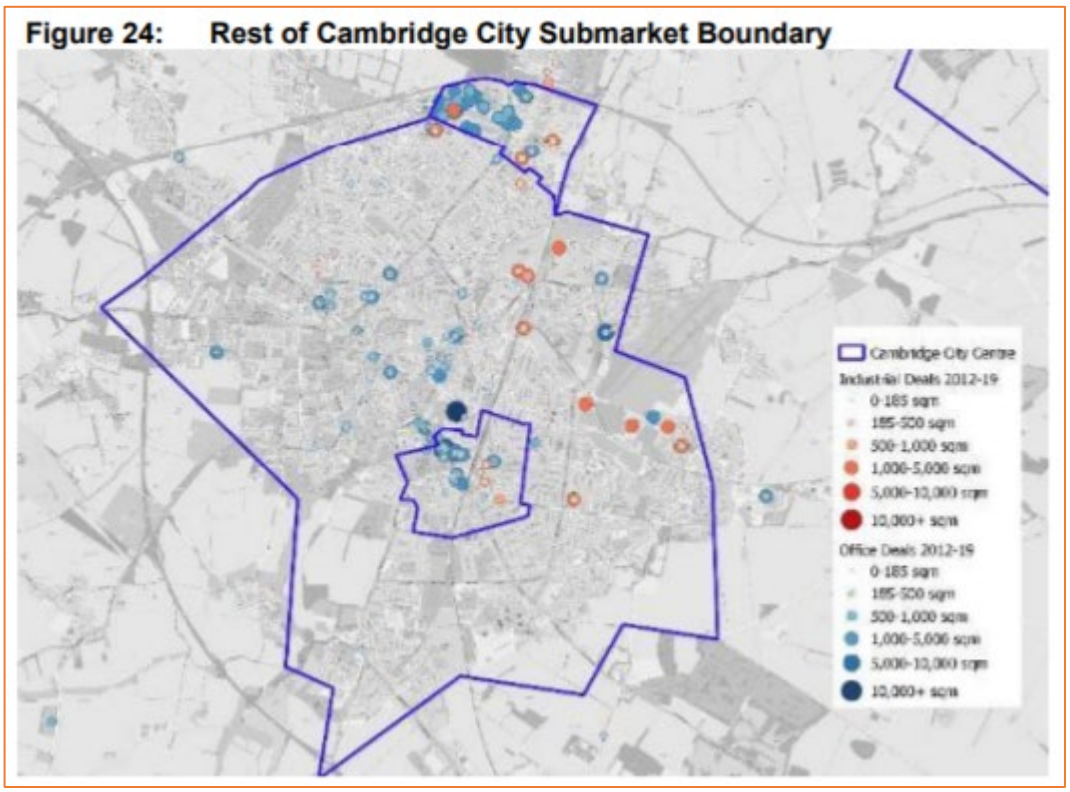


Figure 1: Employment Land and Development Document Figure 24 (GL Hearn, November 2020)

5.25. The text for example at 2.78 sets out that 'this submarket is key for R&D due to Cambridge Science Park. The Park has an R&D user clause to preserve the intrinsic nature of the Cambridge Science Park for the mutual benefit of all occupiers, the use of buildings is limited to the following: scientific research associated with industrial production, thus never diluting clustering development.

5.26. However, for reasons not clearly set out mention of the importance of Cambridge Science Park is sanitised from the emerging JLP.

Combining Science, Making and Training

5.27. The location of CSPN provides a unique opportunity to combine the existing highly successful CSP with the neighbouring Cambridge Regional Collage to create a truly accessible gateway to a career in science and technology industry. This is not an opportunity replicated by any other submission through the call for sites.

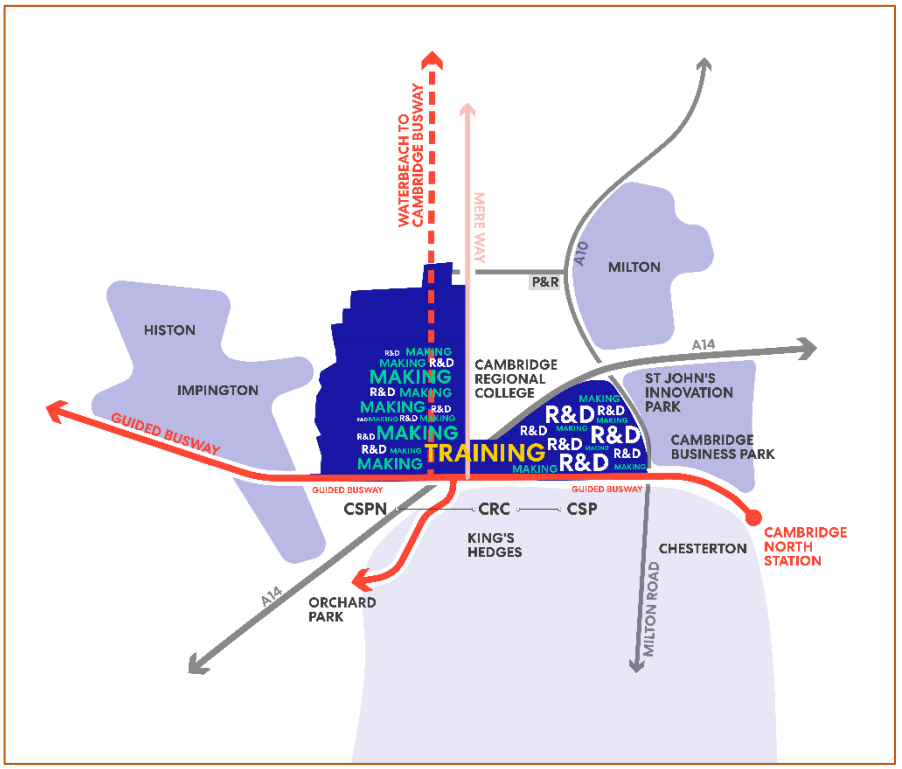


Figure 2: CSPN accessible gateway diagram (Perkins&Will, 2020)

5.28. With a total of 9,600 residents aged 16-18 currently living in the Greater Cambridgeshire area, the apprenticeship positions directly generated by the CSPN proposals would likely go to a significant number of Greater Cambridgeshire residents. Over the next 20 years (the period 2019-2039) the number of residents aged 16-18 in Greater Cambridgeshire is estimated to increase by 15%, resulting in an additional 1,500 residents of this age by 2039

5.29. This increase for residents aged 16— 18 is well above the average increase anticipated for all residents and will place additional demand on the further education programmes offered by the Cambridge Regional College and other local providers. The number of apprenticeships starts offered across Greater Cambridgeshire would have to significantly increase from current delivery levels to meet this predicted demand.

5.30. The CSPN proposals would result in an increase in the number of apprenticeship positions available for local residents, creating an opportunity to reduce the level of education deprivation in the local area and upskill local residents. The Volterra evidence submitted in

support of our submissions estimated additional apprenticeships directly created by CSPN being circa 715-975 based on East of England trends.

5.31. In addition, the CSPN proposals will contain provision for the development of the Cambridge Regional College. Under the CSPN proposals, the expanded Cambridge Regional College would contribute additional education and training programmes, providing the opportunity to reduce the education, training and skills deprivation faced by local residents when compared to the rest of the Greater Cambridgeshire area.

5.32. In the absence of additional education and training programmes such as those provided by the Cambridge Regional College under the CSPN proposals, it is likely that residents in the local area would suffer greater education, training and skills deprivation relative to the rest of Greater Cambridge and the England average.

Socio-economic benefits

5.33. From a socio-economic perspective, a key factor affecting social inclusion is access to education and training opportunities for existing residents, which in turn facilitate the ability of those residents to access and reap the benefits of the jobs delivered by economic growth. Ensuring that residents have the opportunities to develop their education and training levels, such as those that would be afforded by Cambridge Science Park North through job opportunities, apprenticeships and the development of the Cambridge Regional College (CRC), would be key to promoting wellbeing and social inclusion for Greater Cambridgeshire residents.

5.34. Cambridge Science Park has established and will continue to undertake positive engagement with local communities, there is a strong desire to inspire the next generation of innovators.

5.35. Cambridge Science Park North offers the potential to co-locate workspace required by CRC with mid-tech employment provision. This has the potential to offer multiple benefits including:

- Provision of learning space to fulfil the requirements of a growing population. CRC is already at capacity, there are already demographic and future planned growth in the surrounding area will only add to demand, therefore the campus will need to physically expand and the locical location for this growth will be at CSPN.

- Locating apprenticeship opportunities within cycling and walking distance to one of Greater Cambridgeshire's most deprived areas.

- Breaking down barriers to employment for students following vocational training routes and providing inspiring learning opportunities within a thriving Science Park environment.

5.36. Crucially though, without skilled manufacturing opportunities in Cambridge, there will be a shortage of job opportunities for people who want to work in a technical or engineering environment but do not have the qualifications to undertake the roles that require a university degree. These include students at the Cambridge Regional College and North Cambridge Academy.

5.37. If Cambridge allocate sufficient space to accommodate the manufacturing space required by these companies in a sustainable location, a real opportunity exists to develop and nurture this category of jobs through the long term custodianship provided by Trinity College can be assured. This would help to close the inequality gap in the city, and help lift families out of poverty, particularly those in the immediate vicinity of the proposed development such as Arbury and Kings Hedges.

5.38. The emerging JLP references the income and employment disparities between wards in Greater Cambridge[11] – but makes no attempt through policies to address this disparity.

5.39. The Joseph Rowntree Foundation have undertaken [12] research examining opportunities to tackle transport related barriers to employment in low-income neighbourhoods and includes planning tools and approaches to ensure the new housing and employment are considered.

5.40. The location of the site, within walking distance to an area highlighted within the emerging JLP as suffering employment and income disparities does not appear to have been considered through the emerging JLP.

5.41. Through collaboration, partnership work with vocational institutions schools and fostering an environment of innovation Cambridge Science Park North will work to ensure equality of opportunity for all and the removal of structural inequalities and barriers (both perceived and actual) within the Science and Technology innovation sector.

Locating employment on a key public transport node

5.42. Building on the above, a further reasoning for why this site in addition to the compelling economic and socio-economic rationale relate to the sites position at a key transport node.

5.43. The site is extremely well linked to existing public transport corridors, located on the existing guided busway to Northstowe and within close proximity to Cambridge North Railway Station. The published consultation for Waterbeach to Cambridge Public Transit consultation includes a Cambridge Science Park North stop, which Trinity College Cambridge supports and wholly endorses as a forward-thinking approach to infrastructure provision.

5.44. The quantum of housing coming forward within walking, cycling and public transport corridors (circa 43,600 to 2031), provides future employees with sustainable travel to work options. These figures do not include any additional figures which may emerge as part of the new Local Plan.

5.45. Strategic public transport infrastructure including the GCP Waterbeach to Cambridge transit route, and the potential for a segregated bus route connecting the Milton Road Park & Ride and public transport links into Cambridge can all be achieved and accommodated within CSPN. This is important as the evidence base suggests that whilst the NECAAP area is a

[11] Jobs Infographic, P369

[12] https://www.jrf.org.uk/report/tackling-transport-related-barriers-employment-low-income-neighbourhoods

location for intensification, the road network is near (if not at capacity) therefore any intensification requires a strategic scale solution. This directly addresses the Red RAG rating for the strategic highways impact.

5.46. Both Cambridge Science Park and Cambridge Regional College will continue to grow and will place additional movement pressures in the area. A key component of the work being undertaken to release land within the wider NEC AAP is to address the current pressure on the road network, Milton Road specifically. Providing the most direct and therefore fastest route to the existing employment destinations will assist in the step change in mode share required. This provides part of the solution to unlock the entire NEC AAP.

5.47. Trinity College Cambridge are committed to reducing single occupant car trips to CSP, however, in order to do so attractive, reliable, and expedient alternatives need to be available.

5.48. Based on current travel patterns collected through the travel to work survey, around 20% of CSP staff (circa 1,500 employees) are travelling from the north using the A10 corridor or rail services. Once you begin to add CRC staff and students to these numbers this represents the immediate opportunity for the route through CSPN to intercept these movements, north of the A14, and provide a genuine fast and reliable service to the doorstep of Cambridge Regional College and Cambridge Science Park.

5.49. Our vision suggests that in 2040, with the growth of Waterbeach barracks and a rising population, and with enhanced high speed transport links, we forecast that around 2,000 CSP members of staff will live in Waterbeach and these employees are more likely to use the busway if it provides a direct and convenient route to work.

5.50. Fundamentally the Waterbeach to Cambridge project offers an opportunity to avoid congestion and make environmentally sustainable and reliable journeys for employees and learners.

5.51. Trinity College Cambridge are committed to providing this infrastructure as an early intervention as part of CSPN which in turn provides wider benefits to the entire NEC AAP area by reducing pressure on Milton Road.

5.52. This route through to Butt Lane can then be extended as part of a Phase 2 Busway extension to Waterbeach, following a number of routes which can either coalesce with the GCPs other proposed options, or via any alternative to the north. Shuttle services can be provided to benefit the entire AAP area.

5.53. Parking at CSPN would be in the form of a Mobility Hub which would be multipurpose. This would include limited parking associated with CSP North, displaced parking from CSP as part of the wider step change required to accommodate the shift required to achieve the proposed trip budget. Provision of parking for employment across the wider NEC AAP area combined with Park and Ride services utilising a segregated transit route could all be accommodated within the CSPN Mobility Hub.

5.54. Fundamentally the long-term aspiration is that the general Park and Ride services in this location would be decommissioned over time as connection to Waterbeach is made.

5.55. Coupled with public transport improvements, the site at CSPN will incorporate the consolidation centre for CSP and potentially the wider AAP area, with onward delivery by cycle, drone or electric vehicle to the local area which potentially could utilise and link into the busway.

Environmental Quality and Accessibility

5.56. Planning Practice Guidance provides advice on the role of the Green Belt in the planning system. The guidance states that 'where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities.'

5.57. Cambridge Science Park North is being developed as a location that can provide generous compensatory improvements to a substantial (circa 80 hectares) area of remaining Green Belt land providing:

- A network of new green infrastructure; with links to Milton Country Park, Histon & Impington, and Arbury and Kings Hedges.
- Woodland planting of sufficient scale to provide meaningful woodland carbon capture;
- Landscape and visual enhancements taking existing agricultural land and creating a valuable green asset for communities and employees.
- Improvements to biodiversity, habitat connectivity and the introduction of natural capital to an area of low ecological value agricultural land.
- New and enhanced walking and cycle routes, linking into the planned improvements to Mere Way; and
- Improved access to new recreational and playing field provision serving the wider community.

5.58. These proposed uses are all entirely compatible with both the purposes of the Green Belt and uses which are deemed as appropriate within the Green Belt. At this stage Trinity College is committed to continued engagement with key stakeholders to ensure the green space to be retained within the Green Belt is not just of the highest quality, but genuinely benefits the wider community. This work is on-going.

Exemplar Environmental Carbon Positive Campus

5.59. There is a clear commitment by Trinity College to go over and above the standard approach to climate adaptation and resilience on Cambridge Science Park North. A real opportunity exists for an exemplar scheme with the potential to trial and showcase natural resilience features due to the scale and critical mass available on site. In addition, due to the nature of work undertaken there are opportunities to cultivate and trial emerging technologies on site allowing innovation to develop more quickly and solutions to move to market at enhanced speeds.

5.60. It will be an early adopter of environmental initiatives including green transport, waste management, energy, ecology and smart buildings; it will also provide a test-bed for companies developing sustainable products and services in Cambridge and further afield.

5.61. Through innovative design and actively supporting innovation in technological advancement the aspiration of Trinity College is that the land would be working **beyond net zero carbon**. Actively supporting businesses working to develop practical solutions to address climate change.

5.62. CSPN includes innovations that take the development beyond best practice climate change and circularity policy into a Net Positive bracket.

5.63. The CSPN sustainability strategies are extensive and are summarised in the Perkins & Will Cambridge Science Park North Prospectus, which is submitted with this report. Each measure proposed would inform every step of the development cycle from inception through each building's lifecycle.

5.64. As part of our ongoing work on this site, our sustainability consultants are exploring how the site can work to try to achieve net zero and beyond to bring forward one of the most sustainable and innovative developments in the world. We would like to present the detail of this work to you at the earliest opportunity.

The Most Sustainable Location for Growth

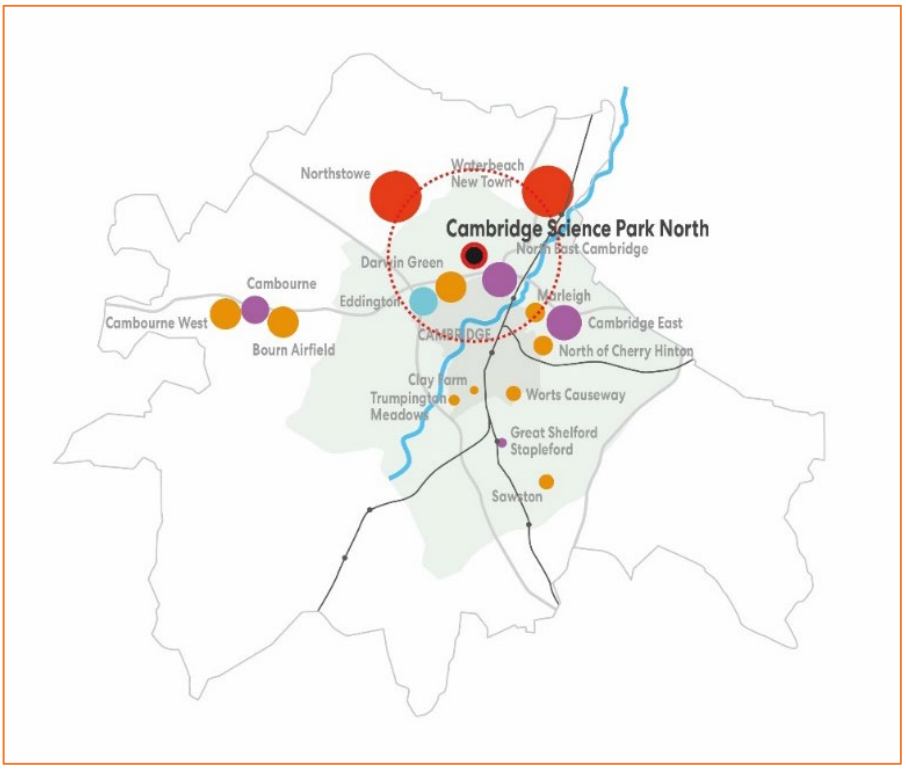


Figure 3: Perkins & Will (December 2021)

5.65. CSPN is located within closer proximity to a higher volume of the key housing growth areas illustrated within the JLP.

5.66. Page 38 of the JLP suggests that the JLP strategy has been strongly influenced by '*reducing climate impacts through compact development located to connect homes and jobs where active and sustainable travel can be maximised.*

5.67. Page 39 goes on to state that
'*We also have evidence that locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help reduce commuting and associated carbon emissions and congestion.*'

5.68. It therefore logically follows that providing additional jobs close to existing and proposed homes in the north of Cambridge utilising the existing and planned sustainable transport measures would be equivalent.

6. Policy S/NEC: North East Cambridge

6.1. There are fundamental issues with Policy S/NEC as set out within the emerging JLP which need to be addressed before TCC can support this policy.

6.2. In short, the following need to be addressed:

- Procedurally, the evidence base for Policy S/NEC was published on the 22nd November, only allowing 3 weeks for responses.
- Deliverability of Policy NEC AAP and the impact on adopted Policy E/1.
- Concerns regarding the jobs growth proposed, and evidence base.
- Deliverability of S/NEC without a strategic intervention to address unresolved transport concerns.
- The open space deficit, and deliverability of S/NEC without the strategic scale public formal and informal open space proposed at CSPN.
- Out of date and / or inaccurate evidence base in support of the policy.

Procedural Issue

6.3. Given the evidence base supporting Policy S/NEC: North East Cambridge was only published on the 22nd November (excluding the Transport Strategy published later), this has only allowed consultees and interested parties 3 weeks to read, digest and respond to a substantial body of text for an important policy within the overarching strategy. The IDP has still not been published.

6.4. The evidence for Policy S/NEC is referenced as being within the Strategy Topic Paper, however this then directs the reader to the evidence prepared to inform the Proposed Submission version 'which will be published later in autumn 2021'.

Deliverability of the NEC AAP

6.5. TCC is fully supportive of the delivery of the Anglia Water project and the resultant regeneration of North East Cambridge. However, as the relocation project is a Nationally Significant Infrastructure Project (NSIP) the ultimate decision will not be made by Greater Cambridge Local Planning Authority.

6.6. Anglian Water will submit a Development Consent Order (DCO) application to the Planning Inspectorate (PINS). This in itself introduces a level of risk to the wider area coming forward. If for any reason the DCO is unsuccessful the wider NEC Area Action Plan Area may face a policy

vacuum. This is compounded by the reliance of the HIF funding required to make the scheme viable relating to the success of the DCO process.

6.7. The removal of Policy E/1 and the replacement with Policy S/NEC: North East Cambridge as currently set out on pages 55 to 58 of the JLP conflates delivery of the Anglia water site with the continued growth of an existing high performing employment location.

6.8. Whilst spatially connected, the text within the JLP underplays the evidence base supporting continued growth at and around Cambridge Science Park and focusses the policy on the delivery of the Core Site.

6.9. In 2014, the Employment Options Study[13] confirmed within its first paragraph that:
1.1 The Cambridge Northern Fringe East area is highly important for the long term growth of Cambridge. Lying within the A14 and outside the Green Belt, the area contains Cambridge Business Park, the most successful office based business park in Cambridge, and St John's Innovation Park, and abuts Cambridge Science Park, one of the most important employment locations in the city.

6.10. TCC fully supports delivery of the Core Site, and the regeneration of this Brownfield Site, however, the NEC Policy area is wider than the Core Site alone and includes key employment sites including Cambridge Science Park and the St Johns Innovation Park together with Cambridge Regional College, the largest further education college in the East of England.

6.11. Indeed, the JLP recognises this potential issue on page 17, stating that
'we need to have evidence of whether the North East Cambridge proposals (see Strategy S/NEC) that form a key part of the development strategy are deliverable.'

6.12. Given the comment above, officers are advised to consider the implications of the Inspectors Preliminary Conclusions to the Tandridge District Council Local Plan examination [14] if there is any doubt over the deliverability of the site.

6.13. This point was confirmed by planning officers during the online webinar held on the 25th November 2021 acknowledging that additional policies would need to be added in to the JLP should the DCO not proceed as anticipated. This is a flawed approach, whereby policies should be included until such time as they should be removed to operate in any other way would be counter to the benefits and certainty afforded by a plan-led system.

6.14. The NPPF is clear on the importance of a plan-led system:
The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs

[13] https://www.scambs.gov.uk/media/8557/final-cnfe-aap-employment-options-study-final-report.pdf
[14] https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/Examination%20matters%20and%20documents/ID-16-Inspector-Preliminary-Conclusions-Advice.pdf

and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.[15]

6.15. The potential unintended consequence of the approach being taken in the emerging JLP is restrictions to the evidenced need for additional employment land in this location resulting from a policy vacuum whilst additional weight is applied to a 'holding' policy which in turn is reliant on an entirely separate DCO process to progress.

6.16. It is understood that the original intention behind this was to enhance the NECAAP by bringing in a really important regional employer and providing opportunities to provide for a genuinely innovative quarter to the City.

6.17. However, the JLP and draft AAP published have resulted in the loss of a Policy for CSP – unjustified by the supporting text and uncertainty with regard to the continued growth and importance of Cambridge Science Park.

Jobs Growth Within the NEC AAP

6.18. The JLP refers to the North East Cambridge Area Action Plan area being able to accommodate 'around 15,000 new jobs (with only some of those anticipated during the Local Plan Period)[16]. There does not appear to be any evidence to support this statement, indeed the evidence base with regard to R&D states that:

'*The sector should continue to see growth. There are some local challenges to keeping up with demand for both wet and dry lab space, albeit there is additional floorspace coming forward including at the Genome Campus (Hinxton), Cambridge Biomedical Campus,* ***Cambridge Science Park*** *and Granta Park (Great Abington).*[17]

6.19. The JLP takes this and proposes additional employment land at the other three locations, excluding Cambridge Science Park – without explanation. The evidence then goes on to state that:

'*GL Hearn recommends that further allocations are made to accommodate both office and wet/dry lab needs in Greater Cambridge. The role and mix therefore of North East Cambridge Area Action Plan in providing a growth overspill function is* ***essential****. It is important that this area provides a mix of B1a/b although given the location it is acknowledged to emphasise B1a office and B1b dry labs with a smaller wet lab proportion.'*

'As reported earlier it is recommended that the higher growth scenario (KS2) floorspace need is planned for. The central scenario (KS3) would see a relative fall of around 120,000 in B1a/b needs compared to the higher growth scenario and therefore is largely balanced in the current

[15] NPPF (2021)
[16] P56 Greater Cambridge Local Plan First Proposals – committee stage version https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/Greater%20Cambridge%20Local%20Plan%20First%20Proposals%20-%20committee%20stage.pdf
[17] Para 1.14, Page 6 https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/FINAL%20Employment%20Land%20%26%20Economic%20Evidence%20Base%20Study%20%28revised%20October%202021%29.pdf

demand and supply, nullifying in quantitative terms significant employment growth needs for example at North East Cambridge. However, given the level of demand in Cambridge and particularly around the Science Park, the central scenario for floorspace would be counter intuitive to market signals[18]

6.20. This is not reflected within the JLP.

6.21. The draft North East Cambridge Area Action Plan published in 2020 referred to 20,000 new jobs being created in the North East Cambridge Area Action Plan area[19]. Within the plan period up to 2040, the draft confirmed that 'The phasing of business floorspace is anticipated to be fairly continuous throughout the plan period.[20] This is at odds with the statement within the First Proposals Local Plan.

6.22. The draft North East Cambridge Area Action Plan confirmed that Cambridge Science Park will be 'the principle source of business space development in North East Cambridge.'[21] This is continued by Policy 12a: Business within the Proposed Submission NECAAP Regulation 19 document[22] however this is not reflected within the First Proposals document.

6.23. Without any trajectory or evidence base presented to qualify the change, the Proposed Submission NECAAP Regulation 19 document reduced the number of new jobs being created within the NECAAP area to 15,000.

Deliverability with Transport Constraints

6.24. Trinity College Cambridge and Cambridge Science Park are committed to a reduction in car parking provision alongside a move to encouraging non-car modes of transportation.

6.25. Upon review of the NECAAP's Transport Topic Paper (November 2021)[23] and wider evidence base it is clear that rationale for CSPN's sifting from the site selection as an employment allocation is not justified.

6.26. The NECAAP Transport Topic Paper erroneously conflates existing adopted policy which has been tested with emerging policy. Specifically, Cambridge City Council Local Plan (2018) Policy 15 'Cambridge Northern Fringe East and new railway Station Area of Major Change'.

6.27. The removal of Policy E/1 and the replacement with Policy S/NEC: North East Cambridge as currently set out on Page 15 of the Transport Topic Paper falsifies the planning position ignoring the continued growth CSP as an existing high performing employment location. A

[18] Para 7.7 and 7.8 https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/FINAL%20Employment%20Land%20%26%20Economic%20Evidence%20Base%20Study%20%28revised%20October%202021%29.pdf
[19] P24 Draft North East Cambridge Area Action Plan
[20] P261 Draft North East Cambridge Area Action Plan
[21] P139 Draft North East Cambridge Area Action Plan
[22] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/NECAAPNorthEastCambridgeAreaActionPlanReg192020v22021.pdf
[23] North East Cambridge Area Action Plan Proposed Submission Topic Paper: Transport (Greater Cambridge Planning Service, November 2021.

comprehensive Transport Strategy for the NECAAP is therefore required to effectively assess the trip budget, impacts on car parking for the whole AAP area, and importantly, the individual sites within it.

6.28. Whilst spatially connected, the text within the JLP underplays the evidence base supporting continued growth at and around Cambridge Science Park and focusses the policy on the delivery of the Core Site.

Strategic Highway Network

6.29. As part of the JLP's HELAA assessment, CSPN scored a Red RAG rating for impacts on the Strategic Highway Network. This has not been underpinned by testable or transparent evidence. As stated earlier in this report, the site was scored as a Red due to its location within Highways England Zone 3 - A14 CNB. The reason given for this is that there is "no capacity for growth" and that "sites would need to ensure no net increase in vehicles trips on the Strategic Road Network."

6.30. The A14 Cambridge Northern Bypass and the M11 North were the only zones considered to have no capacity for growth. This is an overly simplistic assessment to assume that there can be no real future development in these areas when there could be development outside of these zones which will generate trips through these zones.

6.31. This is especially true when considering that the A14 Cambridge to Huntingdon improvement scheme has recently been completed and is now open to traffic and there are plans to improve capacity on the A10. Therefore, the reasons why there is no further capacity for growth on the A14 are not entirely clear.

6.32. Furthermore, sites such as the Core Site within the NECAAP has no opportunity to reduce existing trips or a baseline against which development might not exceed. As such, applying such restriction to sites would make anything other than the intensification of existing sites unachievable.

6.33. To accommodate additional development successfully and sustainably a strategic transport solution such as the one being proposed by CSPN is required.

Site Specific Transport Assessments

6.34. The HELAA suggests that Cambridge County Council undertook transport assessments of each site assessed, considering the potential impact of each on the local transport network, trunk routes, and local roads. Internal workshops were run to review and moderate the individual site assessments.

6.35. The Transport Assessments for each site are not provided as part of the evidence base. It is also unclear how some of the assessment criteria may have been applied and no details over how the transport assessments were used to determine a score against this. For example, a site may have scored Red if located in an area with ongoing transport improvements. However, it might be considered that the opposite of such a location is true in that a site near improvements can benefit from those improved links through improved accessibility.

6.36. Equally, a large, committed development might provide benefits if mutually beneficial i.e. a site promoting employment near to a committed development of housing will be beneficial in terms of locating new jobs close to new homes.

6.37. The data used to determine the mode share also needs to be reviewed in terms of existing and committed floorspace and parking provision. In addition, the proposed development mix needs to acknowledge planned growth in floorspace at CSP.

The CSPN Solution

6.38. CSPN has consistently been presented as a strategic scale solution, which as part of a package of measures to improve accessibility in the area can help to unlock housing development in North East Cambridge.

6.39. Transport consultants Vectos have identified the potential to remove between 275 and 500 peak hour trips removed from Milton Road, within the AAP area if the CSPN transport solution and proposed mobility hub is created.

6.40. Vectos' analysis also shows that 20% of existing trips to Cambridge Science Park come from north of the Milton Interchange, if it is assumed a similar percentage travel to CSPN a significant number of trips can be removed from the Milton Road corridor benefiting the trip budget.

6.41. CSPN is at the confluence of several key movement corridors. Future employees of the site would be able to travel to work sustainably, with last mile journeys undertaken via active and sustainable transport.

6.42. The preferred route for the Waterbeach to Cambridge Busway will pass through CSPN. Additionally, the NECAAP evidence base identifies the need for a segregated public transport and active travel link from the Milton Park and Ride as a key measure of the overall Transport Strategy to allow development to come forward.

6.43. CSPN can deliver a first phase of the Busway link connecting consolidated parking or a relocated Park and Ride site to the existing Busway, providing a fully segregated link into north east Cambridge. The proposal would work either as a first phase if a direct route north or as a spur should the route pass the existing park and ride site.

6.44. CSPN can therefore deliver significant infrastructure improvements identified within the NECAAP. No other site in the area is able to deliver infrastructure improvements as significant or anything that will singularly contribute positively to the Trip Budget.

6.45. A primary mobility hub located on the connection would also facilitate a direct route for pedestrian, cyclist and bus users, whether an electric bus or Automated Vehicle pod to access the site.

6.46. CSPN has the opportunity to reduce congestion in north east Cambridge by:

- The introduction of the new GCP busway stops and route delivery

- Consolidated mobility hub including Park & Ride facilities serving CSPN, CSP and wider NEC area
- A zero net increase in parking from Cambridge Science Park,
- Expansion of existing electric bike programs
- Autonomous vehicle pilot programs and time-saving new mobility choices and parking options within Cambridge Science Park North are critical to the successful delivery of North East Cambridge as a whole district by releasing pressure on the Milton Road.

6.47. Within CSPN, all private vehicles will be required to be left in shared parking at the mobility hub creating a culture of sustainable travel, improved people connections, and freeing up space for greater sustainable features. The framework of streets within the development will be pedestrian and cycle first with only limited vehicle carriageway and access only for essential deliveries or permitted vehicles. A consolidation logistics Hub CSPN will help reduce delivery vehicle movements across the wider NEC district, making cargo bikes, electric vans or drones possible.

Open Space Deficit

6.48. A key area of concern within the NECAAP is the shortfall of Open Space provision.

6.49. The residential development proposed within the NECAAP generates a need for 36ha of informal open space. However, over a third of the 36ha provided for is at the existing privately owned Cambridge Science Park (12.37ha) and St. John's Innovation Centre (1.46ha).

6.50. As identified in the North East Cambridge Area Action Plan Green Spaces Topic Paper (GSTP) (November 2021), both green spaces at CSP and St. John's aren't perceived as being accessible to the wider public, limiting their communal impact. Additional recreation space is quoted as being provided at CSP and the Cambridge Regional College, however, these facilities are private and require some form of membership to access them[24].

6.51. TCC therefore echoes concerns from Members and the public during consultation on the NECAAP, in that the shortfall of Open Space needs be addressed if the NECAAP - and by proxy the JLP - is to be successful.

6.52. The importance of high quality and accessible open space is now recognised as a societal need, playing an important role in keeping residents and workers physically fit. Just as significant is the now widespread understanding that the associated positive impacts of high quality and usable open space has on mental health.

6.53. TCC would also like to register its concern at the lack of formal recreation space within the NECAAP area, which is highly unusual for a development area of its size. A key facet of any thriving community is access to formal recreation space.

[24] North East Cambridge Area Action Plan Proposed Submission Topic Paper: Open Space & Recreation (Cambridge Joint Planning Service, November 2021).

6.54. It is understood that there is a longstanding ambition to develop the sports lakes adjacent to Milton Country Park into a 220-acre multi-use Country Park which would be combined with Milton Country Park[25]. Whilst TCC would support such a proposal, it would require planning permission which has not been secured and no firm programme for its delivery is in place.

6.55. Milton Country Park is also not easily accessible for existing tenants at CSP and adjacent Regional College, being a ten minute bike ride or half an hour walk away. Several other areas of open space and formal recreation space have been quoted in the GTSP, however, as clearly identified in Figure 4 there is a significant lack of largescale publicly accessible Open Space and formal recreational space for the western edge of the NECAAP area around Histon and Impington and Kings Hedges wards.

Figure 4: Cycle Catchment Map, NECAAP Topic Paper: Open Space & Recreation (Cambridge Joint Planning Service, November 2021)

6.56. This defines the intention of creating a north Cambridge Green Space at CSPN, noting that there is a deficit in accessible green infrastructure for the surrounding area. There is an

[25] Greater Cambridge Green Infrastructure Opportunity Mapping (LUC, 2020).

identified need for a strategic natural greenspace (c. 100ha) and Natural England has suggested the need for a large (c. 500ha) National Nature Reserve or similar in the area[26].

6.57. Easily accessible 'doorstep' open space is critical if the JLP's sustainability goals are to be achieved. This is especially important for those with disabilities where their mobility is restricted. It is therefore TCC's view that the JLP's open space strategy is flawed.

6.58. For the NECAAP to thrive as a vibrant, healthy, sustainable location this clear Open Space and formal recreation space deficit needs to be addressed. If allocated within the JLP, CSPN would deliver circa 80ha of publicly accessible park land and sports facilities, accounting for approximately 50% of the total site area.

6.59. TCC's client team has been in regular contact with Histon and Impington Parish Council in relation to TCC's proposals for CSPN. The provision of additional open space is viewed as an opportunity to address current deficiencies for the Parish, and the TCC will continue to work with the Parish Council to develop proposals which can genuinely support the local community[27].

6.60. As identified in the Landscape Partnerships accompanying report, the proposed CSPN country park would provide a significant contribution to positively enhancing the retained part of the Green Belt within the Site and appropriate compensatory improvements and enhancements, covering approximately half of the Site. This would make a very important contribution to the Green Infrastructure of Cambridge as identified in the Greater Cambridge Green Infrastructure Opportunity Mapping, September 2021.

6.61. New high quality sports pitches and link would be provided for the neighbouring Cambridge Regional College, benefiting students and the wider local community.

6.62. A summary of all the proposed vision of community recreational and open space facilities is shown in Figure 5. CSPN will be an open campus with other amenities and community facilities, which will therefore be greater reason to visit the park.

[26] Green Belt Study Review (The Landscape Partnership, December 2021).

[27] https://www.hihub.info/news/residents-urged-to-have-their-say-on-land-use-proposals-in-histon-impington/

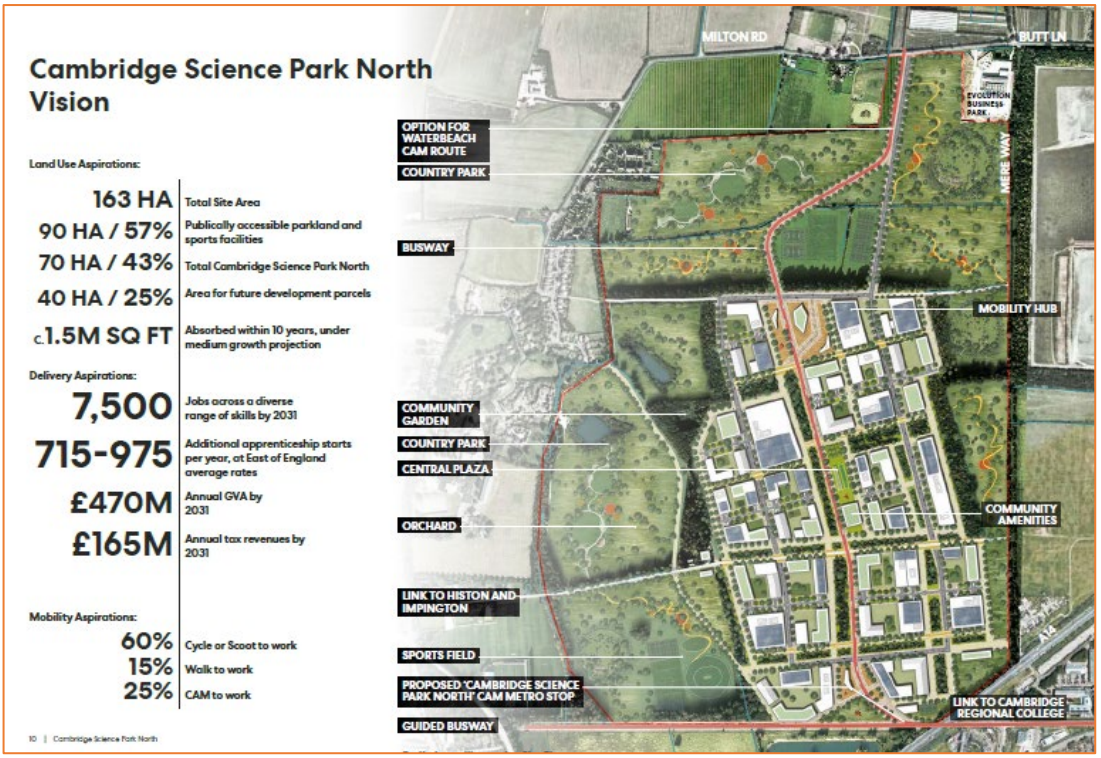


Figure 5: CSPN Vision. Perkins&Will, 2021.

Biodiversity Net Gain Deficit

6.63. The existing site is of low habitat and biodiversity value. CSPN has the opportunity to increase the biodiversity value of a large area through diversification of species, protection and promotion of hedgerow management, and innovative integration of habitat within building design. A significant Biodiversity Net Gain of over 20% would be achieved, whilst securing the area for the enjoyment of local residents, students and employees.

The next logical step

6.64. In 2014 the NECAAP only included land identified between the A14 to the north, the A10 Milton Road to the west, the Cambridge to King's Lynn railway line to the east, and the Chesterton residential area to the south. It included Anglian Water's Water Recycling Centre, a mix of predominantly office and industrial uses alongside the various branches of Cowley Road, Chesterton Rail Sidings, offices on the Cambridge Business Park, and industrial uses off Nuffield Road.

6.65. The NECAAP has no road capacity for growth. In 2019, when the transport evidence base was prepared CSP was included within the NECAAP and commentary on parking restraint was added to the consultation documents.

6.66. The enlargement of the NECAAP area to include CSP therefore appears to be to enable growth within the wider area via the reduction of vehicular trips into CSP. **Without CSP would the NECAAP be able to accommodate growth?**

6.67. As set out within the accompanying **Vectos Transport Note** we have previously identified clear concerns associated with the methodology used to reach the conclusion that a Trip Budget is required to deliver the NECAAP.

6.68. The key transport evidence supporting the NEC AAP is the North East Cambridge Area Action Plan Transport Evidence Base (September 2019). Previous submissions query a range of matters associated with:

- Assumptions over floor areas which appeared inaccurate
- Job numbers assumed at CSP which were too low
- A reliance on reducing car parking at CSP, ignoring the complexities over delivery of this associated with long leaseholders.
- Unclear application of committed developments, particularly at CSP.

6.69. Whilst questions have been asked and discussions with the highway authority and Greater Cambridge undertaken, the assumptions made and nature of the assessment has never been clearly explained or resolved.

6.70. The Evidence Base also stopped short of clearly identifying how the Trip Budget would be allocated across each individual site within the NECAAP. This is a key omission and without understanding the target vehicle trips that the strategy might dictate, and effective and achievable Transport Strategy cannot be prepared.

6.71. The clear conclusion of the Evidence Base is that in order for wider development across the NECAAP site to come forward, existing uses, with a significant leaning and reliance on CSP, must reduce car trips.

6.72. The delivery of CSPN actually delivers key items identified within the 2019 Transport Evidence Base[28], for example page 6 sets out the following measures:

● *Increasing Park and ride (P&R) provision accessible to the site, with a strong location for this being the Milton Road P&R, to the north of the A14, the proposed P&R site at Waterbeach, and potentially others surrounding Cambridge subject to securing appropriate connections to those.*

● *To make this offer more attractive, frequent and reliable public transport connections could be provided by means of a segregated link off the A10 (via Mere Way), which could be linked to the guided busway to provide a quicker passage all the way to the Cambridge North Station (CNS).*

● *Secure cycle parking spaces could also be provided at Milton Road P&R. This, combined with an appealing pricing strategy and an attractive segregated route, could provide an enticing alternative to some commuters.*

● *… these measures could be adapted or replaced by other, more innovative, solutions as these are developed including the potential evolution of the Milton P&R into a more general multi-*

[28] https://www.greatercambridgeplanning.org/media/1234/nec-aap-transport-evidence-base.pdf

modal travel hub with some of the car access potentially being replaced with demand responsive feeder services, building upon the Combined Authority aspirations to reduce car dependency to P&R sites.

6.73. Without significant interventions such as those which may be delivered by CSPN, a reduction in vehicle trips at CSP, sufficient to allow the delivery of the wider NECAAP will be difficult to deliver.

7. Summary & Conclusions

7.1. The exclusion of a draft allocation for CSPN at this stage is regrettable and it is TCC's view that following a review of both the supporting evidence bases for the JLP and North East Cambridge Action Plan (NECAAP), that neither documents current aims are deliverable without CSPN being allocated.

7.2. The JLP also does not identify how Cambridge can meet its future job targets or identified need, particularly in the mid-tech sector. To achieve the transport, employment and socio-economic aims of the JLP, and separately the NECAAP, a radical reappraisal and interrogation of its supporting evidence base is required.

7.3. The evidence base is inconsistent and in places flawed. An allocation for CSPN provides the supporting policy and development management framework to recognise and harness CSP's continued evolution and regional role as a significant contributor to employment, research and development for the Cambridge and UK economy. Additionally, an allocation for CSPN provides the capacity to deliver on the JLP's stated employment aims. Its allocation is also an exciting opportunity to keep Cambridge at the forefront of innovation, securing a mid-tech future for Cambridge, the region, and the UK as a Scientific Superpower.

Cambridge Science Park

7.4. Cambridge Science Park is the most sustainable location for further employment growth within Greater Cambridge, **therefore the emerging JLP should reference the continued importance of Cambridge Science Park as an employment site.**

7.5. Given the recognition of all other comparable science parks and employment destinations within the emerging JLP, and the recognition that North East Cambridge is the most sustainable location for development in Greater Cambridge.

7.6. The emerging JLP should therefore include the following policy:

Policy S/CSP: New Employment Provision – Cambridge Science Park

Appropriate proposals for employment development and redevelopment on Cambridge Science Park (as defined on the Policies Map) will be supported, where they enable the continued development of the Cambridge Cluster of high technology research and development companies.

The need for Mid-Tech

7.7. As part of our Call for Sites submission we provided a 2019 report by Volterra (resubmitted for ease of reference), which clearly set out the floorspace requirements of mid-tech occupiers, to 2031 as ranging between c. 80,000 - 450,000 sqm of new floorspac.

7.8. A further Technical Note by Volterra is submitted with these representations setting out our feedback on the methodology and why we believe that the emerging mid-tech sector is not appropriately considered or acknowledged in these requirements, leading to a substantial

under-provision of space which, if taken forward, will result in constraints on employment growth in the future. The importance of mid-tech and why it is not covered in the Employment Land Review are summarised as follows:

• Mid-tech is not included in the 'key sectors' that are used to forecast employment need as these identify previously growing sectors, rather than future growth sectors;

• The densities and use classes used to estimate future floorspace need may not be appropriate for the mid-tech sector.

7.9. We would urge Greater Cambridge to review the evidence with regard to mid-tech needs, and to engage with the Cambridge Science Park team to understand the needs of the sector.

7.10. We ask why has there been no consideration of mid-tech as a growth sector? Had this been done, it would be clear that

(i) it has a large growth potential and
(ii) it would benefit from clustering with CSP.

7.11. Our own analysis of the sectors which make up mid-tech highlights a very significant concentration of mid-tech in the local area. **Why is this not acknowledged or given any weight?**

7.12. The emerging JLP should recognise the importance of the research, development & innovation that occurs within the Cambridge economy and the need to accelerate the move to net-zero by supporting scientific innovation.

<u>The appraisal of CSPN</u>

7.13. A review of the HELAA results for the other large employment sites identifies that there are other sites scoring similarly that are taken forward for Green Belt release.

7.14. Interrogating the two red scores for CSPN these relate to Landscape and the Strategic Highways Impact, the former has been considered on a strategic basis and takes no account of the local landscape (ie the impact of the A14) nor the landscape improvements included within the proposals. The Strategic Highways Impact is questioned for a scheme committed to no net increase.

7.15. However, despite CSP North being categorised as Red for its suitability, the site has been carried forward for the SA and an appraisal undertaken.

7.16. The site again scores similarly to other Green Belt sites taken forward for release. The SA then undertaken for the policies relating to those sites includes the policy mitigation, for example where landscape improvements are included within the policy, those sites are then afforded a more positive score than a site not taken through to policy wording. If this approach were undertaken for CSPN the site would score similarly well through the SA process.

7.17. The arguments made for other sites could also be said of CSP/CSPN but in the context of mid-tech rather than life sciences. CSP plays a recognised role in the clustering and growth of high-tech firms, supporting start-ups and scale-up businesses, but now needs space to enable mid-tech firms to continue to innovate and grow here. Whilst this growth could occur to a lesser scale on alternative sites outside the Green Belt, this would not benefit from the clustering with CSP and therefore the growth would be lower and less productive (the opportunities provided by a co-located Campus). CSP has, and CSPN will, be subject to significant private sector investment (just as valuable – arguably more so – than public investment) which in turn will deliver benefits to the public sector, such as playing a crucial role in delivering the sustainable travel objectives of the area.

7.18. It is therefore questioned as to why these arguments are recognised in the context of other Green Belt sites but not CSPN?

Exceptional circumstances

7.19. The need for mid-tech is demonstrated, and the need for this type of employment space in close proximity to Cambridge Science Park and Cambridge Science Park has a distinct and unique set of characteristics, not available anywhere else at other research facilities in the sub-region and fully aligned with the Government's Industrial Strategy.

7.20. CSPN would benefit from proximity to CSP and the long term custodianship of Trintiy College Cambridge, the later having made CSP one of the most successful Science Parks in Europe.

7.21. The socio-economic benefits in this location are illustrated, and links to Cambridge Regional College and wider educational institutions will benefit the next generation of innovators.

7.22. The sustainability credentials of delivering this site on a key transport route are clear, whilst the vision for a site with the highest environmental quality are demonstrated.

Risks to NECAAP

7.23. Without significant interventions such as those which may be delivered by CSPN, a reduction in vehicle trips at CSP, sufficient to allow the delivery of the wider NECAAP will be difficult to deliver.

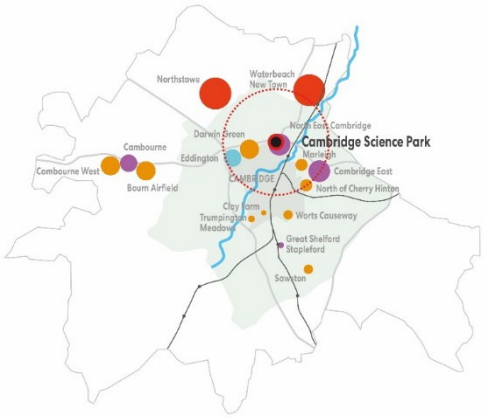
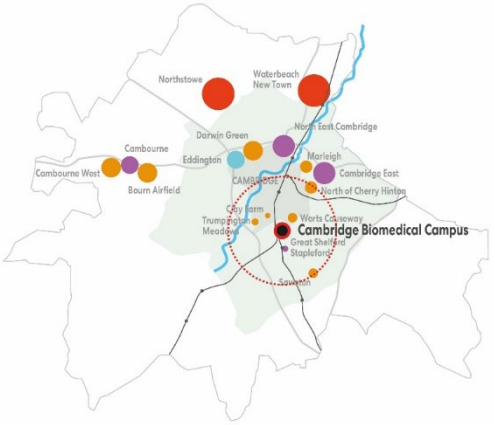
Conclusion

7.24. The exclusion of a draft allocation for CSPN at this stage is regrettable and it is TCC's view that following a review of both the supporting evidence bases for the JLP and North East Cambridge Action Plan (NECAAP), that neither documents current aims are deliverable without CSPN being allocated.

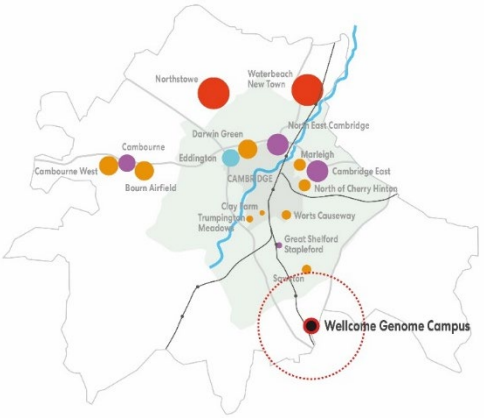
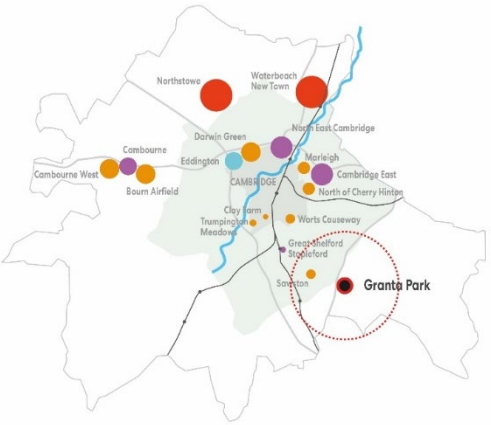
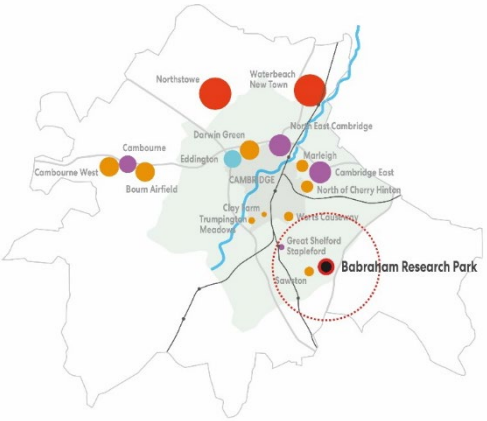
7.25. The JLP also does not identify how Cambridge can meet its future job targets or identified need, particularly in the mid-tech sector. To achieve the transport, employment and socio-economic aims of the JLP, and separately the NECAAP, a radical reappraisal and interrogation of its supporting evidence base is required. The evidence base is inconsistent and in places flawed.

7.26. An allocation for CSPN provides the supporting policy and development management framework to recognise and harness CSP's continued evolution and regional role as a significant contributor to employment, research and development for the Cambridge and UK economy. Additionally, an allocation for CSPN provides the capacity to deliver on the JLP's stated employment aims. Its allocation is also an exciting opportunity to keep Cambridge at the forefront of innovation, securing a mid-tech future for Cambridge, the region, and the UK as a Scientific Superpower.

Appendix A – Employment Sites Comparison

Employment Site	Size	Number of companies / employees	JLP additional homes growth
Cambridge Science Park[29]	152acres (61.5ha) 2.7M sq ft of existing and permitted buildings	130 companies Circa 7,500 employees	
Cambridge Biomedical Campus[30] **(Ph1 and Ph2)**	68ha 1.8M sq ft	Circa 17,500 emloyees Nb – includes hospital employees	

[29] https://www.cambridgesciencepark.co.uk/
[30] https://cambridge-biomedical.com/

Employment Site	Size	Number of companies / employees	
Wellcome Genome Campus[31]	125acres (50.5ha) 800,000 sq ft of existing Further 1.6M sq ft permitted	Circa 2,600 existing employees (rising to 6,800 via outline permission)	
Granta Park[32]	120acres (48.5 ha) 1.3M sq ft of existing buildings	30 companies Circa 3,700 employees	
Babraham Research Park[33]	430acres (170 ha)	60 companies Circa 2,000 employees and 300 academic researchers	

[31] https://www.wellcomegenomecampus.org/
[32] https://www.grantapark.co.uk/
[33] https://www.babraham.com/

Appendix B – HELAA Employment Sites Comparison

Reference	40096	51604	51604a	OS217	OS056	OS214	OS215	40441	52057	52058	52059
Site	**CSPN**	**Brabham Research Campus**		**Cambridge Biomedical Campus**				**Welcome Trust Genome Campus**			
Suitable: overall assessment											
Adopted Development Plan Policies											
Flood Risk											
Landscape and Townscape											
Biodiversity and Geodiversity											
Open Space/ Green Infrastructure											
Historic Environment											
Archaeology											
Accessibility to Services and Facilities											
Site Access											
Transport and Roads											
Noise, Vibration, Odour and light pollution											
Air Quality											
Contamination and Ground Stability											
Further Constraints: Constraints to development											
Further Constraints: Strategic Highways Impact											
Further Constraints: Employment											
Further Constraints: Green Belt Assessment of Harm											

Table 2: HELAA RAG Ratings for CSPN and other major employments sites which have draft Allocations in the JLP.