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Cambridge Biomedical Campus Draft Supplementary Planning Document

Consultation Response of the Trumpington Residents' Association

Table of contents

Section	Page number
Welcome initiative	2
Cambridge Biomedical Campus Ambition	2
Water Supply	3
The Greater Cambridge Green Belt	3
Cambridge city edge	5
Connectivity and movement	5
Obligations and mitigation	7
SIGNIFICANT POINTS OF DETAIL:	7
Chapter 2:	
➤ Paragraph 2.7, Cambridge South Station	7
➤ Paragraph 2.8, New Hospitals	8
“Key statistics of the Campus”	9
Chapter 3, Site Context	9
Chapter 4, development principles	9
➤ Paragraph 4.19, car parking provision	9
➤ Paragraph 4e 3.2, lighting of buildings and open spaces	10
Appendix 1 – Policy 31, page 49	10
Appendix One EXTRACT from “CBC Supplementary Planning Document – Broad issues / topics we would like the document to cover (with brief comments)”, Trumpington Residents' Association, 26 August 2024	11

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Welcome initiative

We welcome this initiative by the two councils and the Shared Planning Service (SPS). This is for the reasons given in our note to the SPS, "Broad issues / topics we would like the document to cover", 26 August 2024, on which we have relied when assessing the draft Supplementary Planning Document (SPD). [The relevant extract is reproduced here in Appendix One] Unless stated otherwise, we support the proposed intentions and content of the draft SPD, and look forward to its use in guiding future development proposals for phases one to three of the Cambridge Biomedical Campus (CBC), and in the assessment / determination of planning applications.

CBC Ambition

The ambition statement proposed in the draft SPD is welcomed [page 11] - with suggested additions to its first paragraph as shown in italics below:

"The Cambridge Biomedical Campus will be a world-leading location for excellence in healthcare, education, medical innovation and life science research - creating an optimum environment for the rapid and effective translation of research into clinical practice – integrated with surrounding communities as well as the wider landscape beyond the city." [Page 11]

The suggested additions seek to incorporate the crucial characteristic of the CBC which the draft SPD rightly suggests is "the relationship (which) makes the Campus unique globally." [Draft SPD, "Ambitions for the Campus and developments to date", Chapter 2, page 9] This characteristic is not fully captured in the draft as it stands. They also add "excellence in" which is consistent with previous ambition statements, and "education" which is integral to the CBC's overall purpose, as noted in the Executive Summary (page 4).

We note that the CBC's Vision 2050 updated by CBC Limited is "currently under consideration as part of the emerging Greater Cambridge Local Plan." [Paragraph 2.9, page 11]. We have assessed the updated version of Vision 2050, noted that the amendments made are not of sufficient substance, and **concluded that the document continues not to be fit for purpose** - for the reasons given in our joint "Assessment" report with Great Shelford Parish Council.¹

¹ CBC Vision 2050 – An Assessment by Great Shelford Parish Council & Trumpington Residents' Association. February 2024

<https://www.greatshelfordparishcouncil.gov.uk/wp-content/uploads/sites/105/2024/03/FINAL-Cambridge-Biomedical-Campus-Vision-2050-An-Assessment-Feb2024-1.pdf>

Water Supply

We appreciate that the draft SPD makes various references to water – on pages: 17 (“minimising pressure on resources such as water”); 37 (The Cambridgeshire Flood and water SPD relating to management of “flood risk and the water environment”); 38 (“seek to exceed water efficiency targets”); 44 (“Minimise the use of water through...”); 48 (Appx 1, Policy 28 “water efficiency”); and 49 (Appx 1, Policy 31 “surface water run-off”).

These references, not all of which relate to water supply, are dispersed throughout the draft SPD thus lessening their impact. And, most importantly, they do not include essential reference to the Environment Agency’s “Guidance Note for planning applications, Water resources and Growth in Greater Cambridge”, March 2023. While this “provides advice for major planning applications which are accompanied by an Environmental Impact Assessment”, the principles that underpin the guidance apply also to reserved matters applications within major planning permissions such as CBC phase two. They also apply to a major planning application for CBC phase 3.

The water supply crisis in rapidly growing Greater Cambridge warrants a high profile in the CBC SPD, which it does not have in this draft. The need for water neutrality in developments should be emphasized, as should the urgent need underpinning it given the inability to date of the Cambridge Water Company to satisfy the Environment Agency on levels of abstraction from the aquifer and consequent harm through its depletion – with subsequent harm to our unique chalk streams. The SPD should make direct reference to the Environment Agency’s “Guidance note for planning applications”, and make clear that CBC applicants are expected to demonstrate satisfactorily the account they have taken of the Guidance.

The need for this was illustrated in the most recent CBC planning application – 14/01529/REM. It was not until our objection was made that the applicant demonstrated that adequate attention had been paid to this critical issue, and we were able to withdraw the water supply aspect of our objection. This should not have been necessary, and would not have been had the profile of this issue been sufficiently high within the CBC.

The Greater Cambridge Green Belt

Given their location, many CBC proposed developments can have a significant impact – positive or negative – on the neighbouring Green Belt. ***This is not highlighted sufficiently in the draft SPD.***

The CBC has already taken 77 hectares out of the Green Belt in a sensitive location close to the Gog Magog Hills (which are not mentioned in the draft, as they should be), the first part of which is the immediately neighbouring White Hill (also not mentioned). Three of the five stated purposes of Green Belts that are particularly pertinent are:

- “b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns;”

[National Planning Policy Framework, July 2021, paragraph 138]

CBC developments should have explicit regard to these purposes and show that they have done so. Phase 2 and 3 developments in particular have a potentially significant effect on the neighbouring Green Belt. This is particularly but not only the case in relation to the fragile and vulnerable Nine Wells Local Nature Reserve which requires protection and enhancement. The neighbouring Hobson's Brook / Vicar's Brook Green Belt Corridor into the city centre, including Hobson's Park, also requires sensitive attention bearing in mind the well-founded impression that with the notable exception of the MRC's LMB building, the CBC has figuratively “turned its back” on Hobson's Park, with insensitive design of building elevations facing our Park. ***The failure to ensure that CBC development does not harm our Green Belt should not be repeated – a presumption in favour of suitable Green Belt enhancement should be built into the SPD.***

The historical lack of attention by the CBC to its neighbouring Green Belt is exemplified in the CBC's Vision 2050 (original and updated versions) where it “is not mentioned once”. [See footnote 1 on page 2] This is also not aided by Chapter 3 of the draft SPD, “Site context”, where the presentation of the National Planning Policy Framework under “Planning Policy Context” in paragraph 3.2 on page 14 is ***unbalanced*** in our view. While the text states that “LPAs should pursue development with a presumption in favour of sustainable development”, this is not qualified by the NPPF's requirement that unless “exceptional circumstances” are demonstrated, land may not be removed by LPAs from designated Green Belts for development. Also, it is not until page 47 in Appendix 1 that Local Plan Policy 4, “The Cambridge Green Belt” is mentioned. ***We ask that this lack of balance in the draft text is corrected to ensure that appropriate attention is given to the needs of our Green Belt when CBC development is being considered.***

Nine Wells Local Nature Reserve (LNR): The draft SPD does refer to Nine Wells LNR, which is part of the Green Belt. The development principles include this passage:

“...Consideration also needs to be made for the open spaces at Nine Wells that could be negatively impacted by increased recreational pressure.” [4a Open spaces and landscape, paragraph 4.10, page 30]

The phase two and three developments yet to come forward may be particularly relevant here given their proximity to the fragile and vulnerable LNR. At one time it was hoped that, as part of the Cambridge South East Transport scheme, the LNR would be extended to afford it greater protection. This fell through when the landowner withdrew the land from consideration at roughly the same time as further extension of the CBC was tentatively countenanced in the Local Plan First Proposals. Nevertheless, the issue remains and ***we***

suggest its importance is reflected in a suitable addition to the wording of the SPD – perhaps in paragraph 4.10 by the addition of “and needs greater protection by extension of its area or other means.”

Cambridge city edge

The CBC is at the city edge and the design of developments should take particular account of this. They should seek to enhance the city edge through its clear definition, good design and thoughtful landscaping. Account should be taken of views of the CBC from the Gog Magog Hills including White Hill, as well as views towards those Hills. ***This is not addressed directly in the draft SPD and should be.***

The relevant text is in Chapter 5, Obligations and mitigation, which in “the questions to consider” under “The built form”, asks

“Does the proposal... Make a positive contribution to the city’s skyline through careful consideration of its visual impact?” [page 43]

Use of the word “skyline” meaning “the outline of hills, buildings etc, defined against the sky; the visible horizon” (Oxford Concise Dictionary) seems unclear. Looking at this part of the city’s edge from the fields and Magog Hills outside, it is the whole impression of the buildings that strikes one – their unattractiveness, certainly amongst the older buildings, and their disordered appearance – in so important a view of Cambridge. It is this that new development should seek to modify and improve – and certainly not aggravate. ***We suggest that the text is amended to capture this meaning more accurately.***

Connectivity and movement

We are surprised and disappointed to see that reduction of rat running on the CBC’s private roads does not feature in the proposed development principles, as it should. It is also not recognized in Chapter 3 of the draft SPD, “Site Context”, as it should be. [Paragraph 3.30]

We said in our August 2024 statement of broad issues / topics we would like the SPD to cover:

“All developments should play an explicit part in ensuring implementation of the Prohibition of Driving Order on the CBC’s private road network. It is a scandal that seven years on from the re-enforcement of the Order, it is still unimplemented. As a result, upwards of 2,000 unauthorized vehicles per day rat run through the CBC making a mockery of the CBC’s press release in 2017 headed “Our Campus is not a shortcut”. This not only jeopardizes CBC traffic particularly ambulances, but also increases congestion on neighbouring roads - including Addenbrooke’s Road, Hauxton Road, Shelford Road, Trumpington High Street, Trumpington Road, and Long Road. This must stop.”

The development principles should explicitly state that all CBC development applications / applicants should play their part in driving down the unacceptable level of rat running – contributing to the CBC's collective effort to achieve this.

In response to raising this matter in our recent objection to a CBC planning application, we were told that this “is not a planning matter.” [24/01529/REM] ² ***We beg to differ.***

Decision Notice 08/0521/FUL (pursuant to 06/0796/OUT):

“4. Prior to the opening of the Boulevard for use other than for the operation of the Cambridgeshire Guided Busway, access to the Medical Research Council new Laboratory of Molecular Biology or for construction purposes, the following shall be provided:

- a) All operational number plate recognition cameras (or alternative specified measures) the final design and location of which shall have been submitted to and approved in writing by the Local Planning Authority...

Reason: To ensure that the number plate recognition cameras are installed to discourage through traffic and to ensure that cyclists and pedestrians have sufficient access...”

This clearly indicates that to reduce rat running on the CBC's roads, the installation and effective operation of an ANPR system or alternative is a planning matter.

In addition, we note that there is a de facto collective responsibility on all CBC landowners and occupants to assist the effective implementation of the provisions of the Prohibition of Driving Order. The Order was made by the County Council (also a CBC landowner) to prevent unauthorized use of the CBC's private roads as specifically named in the Order, and so that the Addenbrooke's Access Road could serve its designated purpose of serving the needs of the CBC – and not be a Cambridge southern relief road, which it is at risk of becoming unless the CBC collectively takes necessary action. This risk is evident in the following passage taken from the “Site Context” chapter of the draft SPD:

“Nevertheless, the location of the Campus, the limited connections over the railway and the layout of the existing road network means that most vehicular traffic accesses the Campus from Hills Road and the Addenbrookes Access Road. As a result, this puts pressure on the road network and contributes to local traffic and congestion.” [Paragraph 3.30, page 26]

However, the implication for collective action by the CBC to reduce rat running is, frustratingly, not drawn out.

² Report to Joint Development Control Committee, 18 September 2024, paragraph 9.191

It is for these reasons taken together that we ask as a matter of strategic importance that the SPD's development principles specifically include a responsibility on development applicants to address this crucial issue.

Obligations and mitigation

The development principles proposed in chapter 5 of the draft contain much good content including:

“Does the proposal – Prevent or mitigate additional pressures on the highways network given existing known highway capacity issues in this part of Cambridge...”
[Page 44]

However, it does not encourage applicants to recognize and contribute to the public costs arising in part from their proposed development on the CBC. These costs can be substantial, for example in the as yet unfunded Cambridge South East Transport scheme planned by the Greater Cambridge Partnership in significant part to meet the transport needs of the CBC. **We ask** that consideration is given to the inclusion of a development principle which encourages applicants to make / offer a contribution, albeit relatively small in most instances given the level of additional demand that may arise from an individual development.

Significant points of detail

Chapter 2:

Paragraph 2.7, Cambridge South Station: This notes that:

“It (Cambridge South station) will also mean that communities in the south of the city and beyond will have better access to the rail network and as such, the campus is likely to have an increase in the number of people travelling through it to access the station, increasing pressure on the movement network...”

Network Rail's intention is that Cambridge South will be primarily a “destination” station serving the CBC. This was noted by the Planning Inspector in her October 2022 report to the Secretaries of State recommending the granting of a Transport and Works Act Order:

“The Station is primarily a destination station serving the CBC.” [Paragraph 13.4.67, page 164]

It is not intended to be a suburban station serving south Cambridge and beyond, drawing in passengers from a hinterland, which the wording in paragraph 2.7 might suggest. This is why the station has no general car parking. **We ask that the wording is amended to reflect the station's primary “destination” status.**

In this regard we note that if not managed positively, car “drop off” at Cambridge South Station **could cause significant congestion problems** at this sensitive point in the CBC’s road network. This is where the Cambridgeshire Guided Busway and the shared use path beside it intersect with Francis Crick Avenue, the Cambridge South East Transport scheme and the road between Royal Papworth Hospital and Astra Zeneca joining Robinson Way. This underlines the need to avoid use of Cambridge South Station by unauthorized car drivers, and to encourage use of buses and active travel to gain access to the Station.

Paragraph 2.8, New Hospitals: This states that:

“... the *Cambridge Children’s Hospital*... is currently under construction...” (our emphasis)

This is not correct. The planned hospital is not currently being built. The site has been cleared and secured, with a short access spur provided from Dame Mary Archer Way. The CUH NHS Trust does not have sufficient funding yet to authorize the physical start of full construction. Having been allocated £100 million of Exchequer funding in 2017/18, and allowing for increases in construction costs offset by cost reduction through “value engineering”, It is estimated that at present there is a “residual funding shortfall” of £155 million approx. - plus any shortfall on the philanthropic fundraising combined target of £100 million. The Trust’s submission to NHS England for the Children’s Hospital to be included in the New Hospitals Programme (NHP) for funding was not successful. ***The wording of paragraph 2.8 in respect of the Cambridge Children’s Hospital should be amended to reflect these construction and funding realities.***

The same paragraph also states:

“In 2024, the *Cambridge Cancer Research Hospital* was also approved. This means... there will be four hospitals within the campus, consolidating it as a regional centre for health care...” (our emphasis)

As yet, the Cambridge Cancer Research Hospital is not funded within the New Hospitals Programme, and is one of the 25 hospitals scheduled for review later this year following a Government decision to move seven hospitals constructed mainly from Reinforced Aerated Autoclave Concrete to the front of the Programme queue given the danger of building failure or collapse. In 2023 the National Audit Office report on the NHP gave an estimated total cost of £300 million for the Cancer Research Hospital.

The previous Government allocated only £3.7 billion (later reduced to £3.5 billion) to the NHP, whereas the total cost of building 40 new hospitals was most recently estimated at £26 billion (in June 2024). These facts are reported in the National Audit Office (NAO) and the

Committee of Public Accounts reports on the NHP in 2023. The NAO concluded that there was no prospect of 40 new hospitals being constructed and open by 2030.³

In light of this information ***we suggest that the proposed wording in the SPD concerning “four hospitals” is modified to reflect the funding realities and the uncertainty they entail***, as well as the hoped for plan. ***The need for this is further underlined by*** the alarming disrepair of the NHS estate, with the provisionally estimated high risk maintenance backlog having risen in England to £2.7 billion in 2023/24 within an overall total of £13.8 billion. It is provisionally estimated that the Cambridge University Hospitals NHS Trust has a £211 million maintenance backlog which includes £116 million assessed as high or significant risk. [“NHS estates backlog rises 20% to record high”. Zoe Tidman. Health Service Journal, 18 October 2024]

“Key statistics of the Campus”:

The presentation on page 12 of the draft SPD includes as fact two statistics whose validity has yet to be demonstrated to our satisfaction. These are “Lower cancer, heart and circulatory disease and respiratory disease mortality rates than the national average, with 468 extra lives saved each year”, and “the Campus contributes £4.2 bn to the UK economy each year.” The factual basis for these claims by the CBC needs to be demonstrated in detail including the assumptions made in their calculation. ***They should not be included in the two councils’ proposed SPD until the inbuilt assumptions have been identified and justified.***

Chapter 3, Site Context:

The key on page 19 to the map on page 18 states “20 Cambridge Children’s Hospital (due 2028).” For the reasons given above, ***this needs to be amended*** given the uncertainty about funding. For information – The CUH NHS Trust has recently changed this date to 2029, though this is also affected by the funding uncertainty.

Paragraph 3.24 states “In terms of landscape, the Campus is located between a rolling agricultural landscape in the south...” This is potentially misleading as it omits mention of White Hill / Gog Magog Hills and Wandlebury. ***A more complete description is advisable.***

Chapter 4, Cambridge Biomedical Campus development principles:

Paragraph 4.19 is an ***important statement on car parking provision***. Its meaning is not clearly expressed in the wording where it states in the *first sentence* “... in order for the Campus to continue to reduce its modal shift ambitions and to recognize the significantly

³ National Audit Office (2023). Progress with the New Hospital Programme. 2023. <https://www.nao.org.uk/reports/progress-with-the-new-hospital-programme/> House of Commons, Committee of Public Accounts. First report of session 2023-2024. HC77. National Audit Office. Progress with the New Hospital Programme. <https://www.nao.org.uk/reports/progress-with-the-new-hospital-programme/>

enhanced public transport opportunities..." (Our emphasis) ***The meaning needs to be expressed more clearly.*** As we understand it, the CBC aims to reduce the number of car parking spaces planned or permitted and increase the proportion travelling to/from the Campus by public transport and active travel means together with significant further reduction of single occupancy car trips. If this is what is meant, ***the wording should reflect this in plain English.*** The meaning of the *second sentence* is also unclear: what does "a careful balance" mean? ***This should be explained.***

Paragraph 4e 3.2 concerning "***lighting of (CBC) buildings and open spaces***" - should refer to the Hobson's Brook / Vicar's Brook Green Corridor including Hobson's Park and Nine Wells Local Nature Reserve not just to Hobson's Brook. This important point, not least for CBC phase three applications yet to come forward, is underlined by the recent Joint Development Control Committee debate and decision concerning the appropriate form of lighting for the new shared use path crossing Hobson's Park from the Cambridge Guided Busway to the western building of Cambridge South Station. ***We suggest the wording is amended to refer to all of the Hobson's Brook / Vicar's Brook Green Corridor including Hobson's Park and not only to Hobson's Brook.***

Appendix 1

Policy 31, page 49: A smaller point. Should the last line of the text refer to Policy 28 rather than 29?

Prepared by David Plank

For Trumpington Residents' Association

13 January 2025

APPENDIX ONE

EXTRACT from “CBC Supplementary Planning Document – Broad issues / topics we would like the document to cover (with brief comments)”, Trumpington Residents' Association, 26 August 2024

“Introduction

The Trumpington Residents' Association (TRA) welcomes this initiative by Greater Cambridge Shared Planning (GCSP). A more holistic, coherent approach to Cambridge Biomedical Campus (CBC) development proposals is required.

The CBC's erstwhile resemblance to a “many headed beast” has not improved to the extent that CBC Limited's creation in 2021 seemed to promise. Compartmentalized performance according to “phase” and / or responsible body, reduces the opportunities that do exist for the CBC to become the entity it says it is.

This should not be dependent on the emerging spatial framework proposed by the CBC in response to the GCSP's Local Plan First Proposals' requirement. When The TRA and our Great Shelford Parish Council colleagues were engaged with the CBC prior to CBC Ltd winding up the Local Liaison Group in 2022, we argued for two versions of a spatial framework, one *without* the Green Belt land that the First Proposals said there “*may be a case*” to release – and another with that land. The CBC did not take our advice and proposed a framework which assumes the “expansion land” will be removed from the Green Belt at “very high harm” and loss of “best and most versatile agricultural land”.

In our view this is unfortunate, not least because the additional land may not in the event be removed from the Green Belt - and it will take several years for this decision to be made as the new Local Plan is developed and adopted. In the meantime, the proposed SPD provides an opportunity to put this right to an extent, thereby hopefully improving the CBC's coherence and functioning.”

David Plank

For Trumpington Residents' Association

26 August 2024