

Friday 24th January 2025

Dear Greater Cambridge Shared Planning Service (“GCSP”)

Cambridge Biomedical Campus draft Supplementary Planning Document (“draft SPD”)

1. Great Shelford Parish Council welcomes the publication of this document which makes the approach of GCSP to planning applications on the Cambridge Biomedical Campus (“CBC”) more transparent and helps to fill a gap left by the failure of CBC to update the 2010 Strategic Masterplan and Vision referred to in paragraph 2.8 of the draft SPD following release of the Phase 3 land through the adoption of the South Cambridgeshire Local Plan (2018). Representatives of the Parish Council who were members of CBC’s subsequently disbanded Local Liaison Group were asked by Cambridge Biomedical Campus Limited (“CBC Ltd”) to comment on an emerging Spatial Framework in 2022. CBC Ltd would not agree, despite their request, to prepare such a framework for the existing Campus and Phases 1, 2 and 3 alone. We understand that the emerging Spatial Framework was submitted to GCSP together with a note of the views of the Local Liaison Group (approved by the Parish Council). A summary of the emerging Spatial Framework remains on the CBC website, but is not mentioned in the draft SPD.
2. Although not directly relevant to the draft SPD, as it made clear in its response to GCSP’s First Proposals, the Parish Council opposes any further expansion of CBC.
3. References to numbered paragraphs below are to numbered paragraphs of the draft SPD.

GCSP’s ambition for CBC

4. We support the ambition set out in paragraph 2.9 redrafted as shown in italics:

“The Cambridge Biomedical Campus will be a world-leading location for excellence in healthcare, education, medical innovation and life science research integrated with surrounding communities as well as the wider landscape beyond the city.

Campus occupiers will collectively pursue a shared mission of

- *advancement in healthcare*
- *research and development related to human health*
- *the education and training of the healthcare workforce*
- *Health technology and healthcare process innovation.*

Individual organisations will focus on a different aspect, or aspects, of the quadripartite mission, with overlaps. The campus is also home to a mixed economy of public, private and third sector

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organisations. Balanced development between the different strands of the shared mission, and between sectors will be critical to the achievement of the vision, as will the fostering of productive connections between organisations and sectors.

The Campus already amounts to a significant and separately identifiable area of the City. The principles of placemaking, including the promotion of health and well-being, will be pivotal to its future sustainability and success.”

5. The amendments to the first paragraph pick up provisions elsewhere in the SPD. The Parish Council has been assisted in formulating the second paragraph by Dr Stephen Davies¹. It more accurately described the complex four-stranded mission at CBC and the need for a balance between those strands that the wording included in the draft SPD. At the heart of CBC is Addenbrookes, which is described in accurate, but less than flattering, terms in paragraph 3.27 and which has a maintenance backlog in excess of £200 million. Land for the redevelopment of the acute hospital is reserved in the 2010 Strategic Masterplan.

6. We would like GCSP to look for other opportunities in the SPD to emphasise the importance to CBC of sufficient and properly maintained healthcare provision at CBC for the population the hospitals need to serve and which includes enough space, equipment and staff to undertake clinical research and innovation. How else can it play its part in the continuing success of CBC? It is true as page 1 says that ‘the quality of new development has improved the look and feel of [parts of] the Campus”. However, significant parts of the Campus (in particular, Addenbrookes) have been left behind. So far as possible, this should not be allowed to continue and new development should be encouraged by the SPD to make, and should actually make, appropriate contributions (including financial ones) to improvements to the existing parts of CBC (including the hospitals), to the infrastructure that is needed to service it or to enhancement of the Green Belt.

7. Paragraph 2.9 says that CBC’s Vision 2050 (as recently updated) is under consideration by GCSP. Despite the recent updates, we maintain our fundamental conclusion (in our joint assessment with Trumpington Residents’ Association²) that Vision 2050 is not fit for purpose.

Infrastructure

8. Further development at CBC will place further strain on our already stressed infrastructure:

(a) *water* - “Greater Cambridge external guidance note for planning applications - Drafted by Environment Agency, March 2023 - Water Resources and Growth in Greater Cambridge” remains relevant and should be expressly referred to in the draft SPD; Cambridge Water does not yet have a finalised and published Water Resources Management Plan 2024. Further, future development may be able to help with or fund future reductions to overall water use at CBC. In its 29 November 2024 letter to the Environment Agency, Ofwat and DEFRA, Cambridge Water notes that

¹ Former Chief Operating Officer, Cambridge University Health Partners

² <https://www.greatsheltonparishcouncil.gov.uk/wp-content/uploads/sites/105/2024/03/FINAL-Cambridge-Biomedical-Campus-Vision-2050-An-Assessment-Feb2024-1.pdf> Please also see our shorter, joint statement, following on from a meeting with Cambridge Biomedical Campus Limited in June 2024 - <https://www.greatsheltonparishcouncil.gov.uk/wp-content/uploads/sites/105/2024/09/Statement-V3-FINAL-24.07.2024-pdf.pdf>

“[water usage] has outstripped our WRMP19 forecasts, particularly for non-household demand for water. Cambridge has a high level of Research and Development (R&D) users”. It has also “engaged with Addenbrookes hospital to provide water efficiency advice to support identification of water reuse or reduction opportunities across the estate”.

(b) *electricity* - various Great Shelford residents have been experiencing power outages (generally brief) for several months now. The Cambridgeshire and Peterborough Combined Authority’s (CPCA) recently adopted Infrastructure Development Framework notes that inadequate electricity supply has the potential to be a barrier to development, unless planned, permitted and implemented in a timely manner. The need to ensure that there is a sufficient electricity supply for any planning application should be highlighted in the draft SPD.

The Green Belt

9. The draft SPD explains the history of land release from the Green Belt for CBC (paragraphs 2.5 and 3.10), but otherwise leaves references to the Green Belt to existing Local Plan policies in Appendix 1. This is not satisfactory. The open spaces and landscape aspects of the draft SPD focus on recreation and biodiversity. Both are important, but the relevant purposes of the Green Belt (as recognised in the National Planning Policy Framework (updated in December 2024)³ (“NPPF2024”) should also be repeated, namely:

“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;”.

10. These requirements should be included in the draft SPD as matters to which an applicant should have express regard and explain how they have done so, especially for developments on Phases 2 and 3 of CBC which neighbour, or are close to, the Green Belt. Your own First Proposals mention in draft Policy S/CBC the need to “create a soft green edge of the city, to minimise the urbanising effects of the development and help compensate for harm to the Green Belt”. It would be helpful also to include something along these lines in the draft SPD.

11. We also consider that paragraph 4a.3 does not adequately capture the need to consider the appearance of CBC itself (as a whole), and the city edge it creates, from the Green Belt and from nearby hills or approach roads.

12. We are also concerned, especially in the light of CBC’s backing for the Cambridge South’s proposals put into the emerging Local Plan’s call for sites in 2021, that CBC will never be satisfied with land allocated to it for expansion and will continue to ask for more. We recognise that paragraphs 3.7 and 3.10 describe the supported uses at CBC. Yet there are many sites in and around Cambridge where biomedical businesses are located. Is there scope in the draft SPD for location criteria which limit the kinds of business that can be located on CBC to those which need to be in close proximity to the hospitals?

³ References and descriptions in various paragraphs of the draft SPD will need to be updated to take account of this update

Nine Wells Local Nature Reserve and the Hobson's catchment area

13. The edges of Phase 3 are in very close proximity to fragile and historically important Nine Wells. It requires protection and enhancement. This may, in part, be what the final sentence of paragraph 4.10 is trying to say, but it should do so more clearly.

14. It is understood that any discharge of water into the Hobson's catchment area requires a written agreement with Hobson's Conduit Trust. It would be helpful for this to be mentioned, including the significance of the frequency at which it is discharged (which can impact the levels of oxygenation) and its temperature.

15. Use of salt for de-icing can also have a deleterious effect on the catchment.

16. In this context, we wonder whether the draft SPD could drawing developers' attention to both the Hobson's Conduit Trust website (and especially its annual bioblitz information) and to the relevant parts of the 2020 Greater Cambridge Chalk Streams Project Report in which Cambridge City Council was involved.

17. The draft document does not mention the Red Cross Lane Drain City Wildlife Site. The Cambridge South East Transport Busway Scheme (CSET) environmental impact assessment scoping report mentions it as being "to the east of the alignment, just south of CBC".

Connectivity and movement

18. We have read and agree with the section of the Trumpington Residents' Association response to your consultation on the subject of rat-running through CBC and the need for a collective approach to the Prohibition of Driving Order made by Cambridgeshire County Council and for express references in the draft SPD. This is especially so with the advent of Cambridge South station; appropriate enforcement will be important to discourage those who seek to be "dropped off" at the station.

19. We note that CBC's recently released Travel and Transport Plan 2024 to 2029 has identified that there is "no clear east-west active travel or public transport links at [CBC]". This, plus poor wayfinding signage, significantly contributes to CBC's lack of legibility. We would suggest that this is also referred to in the draft SPD.

20. We agree with what you say in paragraph 2.7 about the opening of Cambridge South station being likely to lead to an increase in what is essentially non-motorised user through traffic. There is already a great deal of this, in the form of people travelling to work and children travelling to the sixth form colleges and other schools. They are not currently well catered for as they pass through CBC, although the Sawston Greenway proposals of the Greater Cambridge Partnership should significantly improve the position.

21. Paragraph 4.19 addresses car parking provision but lacks clarity. The first sentence states: "... in order for the Campus to continue to reduce its modal shift ambitions and to recognise the

significantly enhanced public transport opportunities...”. This phrasing is ambiguous and should be clarified. We interpret this as the Cambridge Biomedical Campus (CBC) aiming to reduce planned or permitted car parking spaces, increase the use of public transport and active travel, and significantly cut single-occupancy car trips. If correct, this should be expressed clearly in plain language. The second sentence is also unclear, particularly the phrase “a careful balance.” Further explanation is needed to clarify its meaning.

The development principles

22. Paragraph 101 of NPPF (2024) says “To ensure faster delivery of ... public service infrastructure such as health, blue light..., local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development”. We do not believe that the development principles adequately reflect the dilapidated state of Addenbrookes and the urgent need for its redevelopment to be planned and then implemented.

23. The main flavour of the principles, as drafted, is to promote commercial development, rather than to promote balanced and sustainable development between different sectors and different strands of CBC’s mission. As the SPD comments elsewhere (3.7) on the poor design and condition of the existing hospital, it would be logical to attach more weight to the imperative of improving NHS facilities. Instead the development principles are silent on this requirement. The document is thus internally inconsistent, unacceptably skewed towards commercial priorities, and neglectful of an issue that will be essential for realisation of the Campus vision.

24. In addition, whilst we are in favour of greater permeability on the part of CBC in its relationship with its neighbouring communities, we would not like to see, for example, retail offerings on the site that take away custom from the business in Great Shelford (paragraph 4b.3.1 is relevant in this regard). Other more detailed comments are:

- (a) who will be able to access the spaces within the Children’s and Cancer Research hospitals (paragraph 4.10)? Presumably access will be limited to patients and their visitors and staff.
- (b) we wonder whether allotments and community grow and food planting spaces are realistic (paragraph 4a.1.4 and 5.5).
- (c) meanwhile uses of land reserved for healthcare provision should not distract from the basic need for that provision.
- (d) proper wayfinding provision around CBC is also relevant to paragraph 4.12. Good, but not excessive, signage makes a huge difference to the public realm (the objective in paragraph 4d.1.1 that arrangements should “allow users to navigate the Campus with ease” is absolutely appropriate).
- (e) the meaning of paragraph 4b.1.7 is not clear.
- (f) none of the proposed additional services and facilities contemplated by paragraphs 4b.3 should encourage additional vehicles to come onto CBC.

- (g) as regards paragraph 4d.1.2 – will the building of the Cancer Research and Children’s hospitals make any difference to blue light routes?
- (h) paragraph 4e.1.2 appears inappropriate in relation to old hospital buildings.
- (i) as regards paragraph 4e.1.4 can clinical buildings harvest rainwater for use by non-clinical users?
- (j) paragraph 4e.3.2 may need to acknowledge the need to light cycle paths appropriately. For example, the existing lighting on NCN11 is inadequate.
- (k) paragraph 4.25 misunderstands the nature of CBC. It is not a single landowner or employer, although some members of CBC Ltd clearly are “anchor organization[s] and key employer[s] in the region”. The remainder of that sentence should also say something about CBC owners and occupiers playing their part to ensure that proposals for healthcare facilities are brought forward and implemented in a timely fashion to bring an end to the current inequality on CBC (see 5 above).

Detailed factual comments

- 25 (a) The draft SPD includes a number of statements such as that on page 2 “The Cambridge Biomedical Campus is an international centre of excellence for patient care and healthcare education, providing world class medical facilities and research.” There is a similar statement in paragraph 2.11. We suspect that the source of these is CBC Ltd, so they are, in effect, developer statements. As such, we wonder whether they are appropriate, unless independently verified by GCSP. For example, we would not dispute that some medical facilities at the Campus are world class, but we have noted at 5 above that Addenbrookes has a really significant maintenance backlog. We are also not clear what is meant by “life sciences services” in paragraph 2.11. Paragraph 3.16 includes some similar claims, but also refers to “biotechnology services”. What are these?
- (b) Paragraph 2.4 claims that CBC is “unique globally”, which is a claim that is not even made in CBC’s own Vision 2050. We suggest it is deleted. We are also not clear about “creating the optimum environment for the rapid and effective translation of research into routine clinical practice”. Equally, this is not a claim made in Vision 2050 and we are not entirely clear about its meaning or that it necessarily applies to all organisations at CBC – the focus of their research will not always be clinical improvements (e.g. the MRC LMB is not motivated by the desire to improve healthcare outcomes for patients. It is motivated by the desire to further the frontiers of understanding about underpinning mechanisms in human biology.)
- (c) In paragraph 1.1, “Some proposals will be in response to urgent and changing needs and priorities on the Campus.” is slightly alarming at large and would benefit from a cross-reference to the example in paragraph 4.3.
- (d) Does the description in paragraph 1.4 match the plan on page 18?
- (e) There are some inconsistencies between paragraphs 2.1 and 2.3 and they need to be conformed, otherwise the drafting implies (for example) that the three NHS trusts are not members of Cambridge Biomedical Campus Limited.
- (f) In paragraph 2.5, it would be helpful to include the size of each phase in hectares.

(g) In paragraph 2.6, Cambridge South station is now due to open in early 2026. Its opening is dependent on agreement to, and implementation of, the new timetable for the East Coast Mainline, according to a representative of Govia Thameslink who spoke at the Railfuture meeting in Cambridge in December. Given that the draft SPD is likely to be in force for a few years at least, we suggest target dates are avoided, as they will inevitably go out of date.

(h) As regards paragraph 2.8, neither the Cancer Research nor the Children's hospitals have full business case approval. The central government funding each is expecting will not be released if and until that approval has been obtained. We are aware that the Children's hospital has made a sufficient start on works to ensure that its 2022 planning permission did not lapse, but the fact that the site has been cleared and secured and has a short access road is not sufficient to support the statement that it is "under construction". It would also be more accurate to say that the Cancer Research hospital was given planning permission in 2024. As regards its timing, the revised New Hospitals Programme announced earlier this week sees it coming forward in Wave 1. A recent announcement from CUH and the University anticipates construction would start in 2026 and complete in 2029. The Children's hospital has a significant funding gap. On a very minor point, sometimes the Rosie is a separate hospital and sometimes it is not. Given that it is shown and expressly marked on the map on page 18, it would be more consistent to say here that there will be five hospitals. As regards the last sentence of this paragraph, one of the two tenants in 1000 Discovery Drive is CUH's histopathology department. It may therefore be premature to assume that the tenants will necessarily be commercial.

(j) we are not convinced that it is appropriate for the draft SPD to repeat as "key statistics of the Campus" information provided by CBC Ltd unless it has been verified by GCSP and the factual basis for these claims is expressly set out. This applies most particularly to the number of lives saved each year and the contribution of £4.2 billion to the economy.

(k) In paragraph 3.2, as already noted, the NPPF2024 has recently been published. Its paragraph 7 now says "the purpose of the planning system is to contribute to the achievement of sustainable development". Paragraph 3.2 should more accurately reflect this.

(m) The map in paragraph 3.17 is useful, but should also show

(i) the site reserved for the new acute hospital,

(ii) the sites of Cambridge Surgical Hospital, the East of England Ambulance Service, the Addenbrooke's Centre for Clinical Investigation, GSK's Experimental Medicine and Clinical Pharmacology Unit and IdeaSpace,

(iii) use 2000 and 3000 Discovery Drive for "Discovery Drive development". The "Plot 9" description is not particularly meaningful. Labels such as "due 2025", "due 2028" and "in development" should be avoided and, in any event, are already not accurate. In addition, the occupiers listed in paragraph 3.19 should be the same as those shown on the map and names should be used consistently throughout the draft SPD (e.g. Victor Dadaleh is not).

(n) In paragraph 3.19, some places shown on the map (e.g. the NHS Blood and Transplant Cambridge Donor Centre) are not listed. Internet research suggests that Iota Pharmaceuticals is at the St John's Innovation Centre.

(o) Are all the "outposts with catering facilities" open to the public (paragraph 3.20)? There will be more retail in the Cambridge South station.

(p) Which employees is the Frank Lee Centre open to (paragraph 3.21)?

(q) As regards paragraph 3.24, the extent to which urban Cambridge wraps round to the east of CBC is limited (the Nine Wells development only) and this paragraph does not mention White Hill and the Gog Magog Hills, which are important landscape features.

(r) As regards paragraph 3.28, the incinerator chimney is also very distinctive when approaching CBC along the A1307. The “northwest” and “northeast” in the final sentence are confusing, especially when taken in the context of the second sentence in this paragraph.

(s) In paragraph 3.29, the railway is now called the West Anglia Main Line, rather than the London to Kings Lynn railway. The description of where the existing MSCPs is appears inaccurate. Surely one of them is to the south of the CBC close to the Cambridge Movement Surgical Hub. Of the three with planning approval, isn't the one for Astra Zeneca already built? Are the ones with planning approval for specific employers? One of the surface level car parks is the proposed site for the Cancer Research hospital and at least one of the temporary ones is on the reserved site for the new acute hospital (along with the helipad).

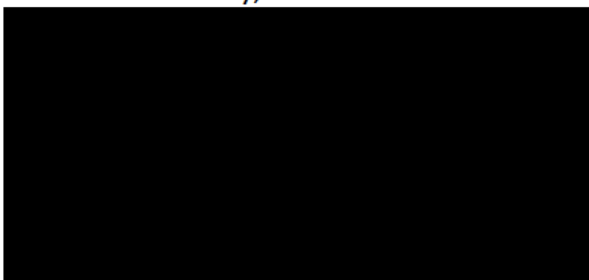
(t) Paragraph 3.30 could also include the updated figures from the recently released CBC Travel and Transport Plan (2024-2029). It may be worth noting that the vehicles figures should be significantly different if there was proper enforcement of the planning requirements designed to prevent rat-running (see 17 above).

(u) As regards paragraph 3.31, the current relationship between the guided buses and the bus station (if any) is unclear to those of us who have never caught a guided bus. See also the point at 18 above about poor east-west connectivity. Further, the walk from Cambridge South station to more eastern parts of the Campus and indeed to the bus station will be significant in length (around 20 minutes).

Pre-publication consultation

26. We think an informal meeting with the most closely impacted communities, such as this Parish, to discuss the proposed direction of travel of the draft SPD would have been appropriate prior to publication of the draft SPD.

Yours faithfully,



Cllr Malcolm Watson
Chair of Great Shelford Parish Council