

**BABRAHAM
RESEARCH CAMPUS
DRAFT GREATER
CAMBRIDGE LOCAL
PLAN 2024 - 2045**

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Appendix 1

POLICY S/BRC – UPDATED SITE ALLOCATION BOUNDARY

Appendix 2

POLICY S/BRC – UPDATED SITE BOUNDARY OF STRATEGIC ENHANCEMENT AREA

1.0 Introduction

- 1.1 These representations on the Draft Greater Cambridge Local Plan (Regulation 18) (“Local Plan”) are prepared by Bidwells LLP on behalf of Babraham Research Campus Ltd (“BRC Ltd”), who in turn represent the Campus partners (UKRI BBSRC, The Babraham Institute and BRC Ltd). They are prepared in respect of Land at Babraham Research Campus.
- 1.2 Babraham Research Campus is identified in the emerging Local Plan, under **Policy S/BRC: Babraham Research Campus**, for mixed-use development to support the future needs of the Campus.
- 1.3 **Policy S/SCP: Policy areas in the rural southern cluster** also proposes a new Policy Area at Babraham Research Campus - a Strategic Enhancement Area (SEA), largely located to the south of the River Granta, which is not proposed for development but for green infrastructure and ecological enhancements.
- 1.4 There remains a significant demonstrable unmet need for further employment and residential development at the Campus. Indeed, an outline planning application for the mixed-use development of the Campus was submitted to Greater Cambridge Shared Planning Service in December 2025 following extensive engagement with the Local Planning Authority, local community, Campus staff and other key stakeholders (under reference 25/04634/OUT). The application is pending determination at the time of writing these representations. The planning application demonstrates a comprehensive approach to the redevelopment of the Campus and fully accords with the aims and objectives of draft Policy S/BRC.
- 1.5 These representations broadly support draft Policy S/BRC, subject to some proposed amendments to the policy wording and supporting Spatial Framework.
- 1.6 BRC Ltd also support Policy S/SEA/BRC, again subject to some proposed amendments to the boundary of the SEA.
- 1.7 Commentary is also provided in respect of a number of other policies in the plan that are relevant to the future development of the Campus.

2.0 Policy S/JH: New Jobs and Homes

- 2.1 Babraham Research Campus Ltd have the following **comment** on Policy S/JH: New Jobs and Homes.
- 2.2 Policy S/JH sets out the level of objectively assessed needs in Greater Cambridge over the period 2024-2045 for jobs and homes. It states that 73,300 additional jobs and a minimum of 48,195 new homes are required to meet the needs for the total population.
- 2.3 The provision of 73,300 additional jobs and 48,195 new homes across the plan period should be regarded as the very minimum rather than a maximum or constraining target. Supporting evidence to the policy titled the 'Greater Cambridge Employment and Housing Needs Update 2024-2045' (September 2025) (EHN), states at 3.55 that the various scenarios modelled indicate a need of between 67,600 and 90,900 additional jobs over the plan period. This compares to between 66,600 and 75,800 additional jobs modelled under the previous 2023 results. This significant increase in the upper end of the modelling indicates that economic growth expectations have strengthened exponentially, not diminished.
- 2.4 As set out in the EHN, during the strongest phase of growth (2010–2020), the Greater Cambridge economy expanded by almost 4,000 jobs per year. The conclusion of the EHN is then based on the 'Central growth' scenario of 73,200 jobs across the plan period, representing sustained annual growth of around 3,500 jobs. Crucially, the Central growth scenario builds in assumptions of slower periods, contractions, and economic shocks, and is therefore inherently conservative rather than reflective of the full growth capacity of the Cambridge economy. It is also worth noting, at paragraph 3.62 of the EHN, it is acknowledged that the 'high' scenarios could be achieved or exceeded if there is a step change in infrastructure investment.
- 2.5 Greater Cambridge is one such location where there has indeed been a step change in infrastructure investment which heightens the urgency in increasing job creation and housing supply and justifies adopting a higher growth scenario. On 23rd August 2024, Matthew Pennycook reaffirmed the Government's commitment to Cambridge stating; "The economic growth of Cambridge has been a phenomenal success and we should seek to maximise the potential contribution that Greater Cambridge could make to the UK economy." Pennycook goes on to say; "Greater Cambridge has a vital role to play in this Government's mission to kickstart economic growth." Furthermore, the Cambridge Growth Company was established in 2024 to address barriers to growth and help unlock Greater Cambridge's full potential. In terms of approach, in October 2025, the Government announced its intention to consult on the case for a centrally led Development Corporation as one potential route for delivery (backed by £400m funding). This is to be the subject of statutory consultation in 2026. It is anticipated that Cambridge Growth Company (CGC) will publish its own evidence base ahead of the formation of the Development Corporation, which whilst yet unknown it is expected that an ambitious growth target will be identified; likely to exceed that currently envisioned by the Councils for the Greater Cambridge Local Plan.
- 2.6 Furthermore, Greater Cambridgeshire has been, and continues to be, the location of strategic infrastructure investment that will continue to drive upwards increases in the need for new jobs and homes. This includes the proposed East West rail station as well as the proposed public transport improvements for the Cambourne to Cambridge corridor and the Cambridge Eastern

Access corridor. The Cambridgeshire and Peterborough Local Growth Plan 2025 also identify priority growth sectors, and the need for further skills development.

- 2.7 The Employment and Housing Needs Update acknowledges a ‘High’ and ‘High Sensitivity’ scenario, whereby growth would meet or exceed the 2010–2020 trajectory. This high level of growth is feasible in Cambridge and would support the Government’s direction of travel. It is therefore important to recognise to the proposed policy wording.
- 2.8 For these reasons, the Local Plan should consider utilising a more optimistic and realistic figure for job and housing numbers and include explicit support for higher-growth scenarios. Without these changes, Policy S/JH risks being unsound and inconsistent with national policy objectives to support sustainable economic growth and productivity.

3.0 Policy S/DS: Development Strategy

- 3.1 Babraham Research Campus Ltd **object** to Policy S/DS: Development Strategy.
- 3.2 Whilst Babraham Research Campus Ltd broadly support Policy S/DS in terms of the identification of Babraham Research Campus as a new employment-led mixed use allocation in the Rural Southern Cluster, they do have a minor observation on the policy wording at part d (ii), as outlined below. Any proposed deletions to the policy wording are shown as strikethrough text and any additions to the policy wording are shown in red text.
- ii. Babraham Research Campus – a new employment-led mixed use allocation to support further growth of this existing world leading bioscience research and innovation campus and improve the health and wellbeing of future employees, residents and the local community through targeted environmental enhancements: including approximately 48,000m² employment floorspace for office and research & development and **approximately 83** ~~120~~ additional homes, supported by focused additional facilities that complement existing local services;*
- 3.3 The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written, as per requirements in paragraph 16 (d) of the NPPF (2024) and reflects the approach agreed with officers at Greater Cambridge Shared Planning (GCSP) service in respect of the outline planning application which is currently pending determination (under reference 25/04634/OUT).

4.0 Policy S/BRC: Babraham Research Campus

- 4.1 Whilst Babraham Research Campus Ltd support the principle of the allocation of Babraham Research Campus for mixed-use development to support the future needs of the Campus, they **object** to the current wording and supporting Spatial Framework.
- 4.2 Requested changes to the wording of Policy S/BRC and the supporting Spatial Framework is detailed below. Any proposed deletions to the policy wording are shown as strikethrough text and any additions to the policy wording are shown in red text. The justification for the changes are set out in turn under each sub-heading and in italics.

Policy S/BRC: Babraham Research Campus

Vision and identity

1. Babraham Research Campus will continue to be a world leading bioscience research and innovation campus, co-locating start up, growing and established bioscience companies. Located at the heart of the Cambridge Southern Cluster life-science ecosystem, the campus will continue to play a key role in bringing together academia and commercial bioscience. It will continue to develop into a place where people can live and work, set within an extensive network of green and blue infrastructure which supports both biodiversity and the health and wellbeing of employees and the wider community.

Uses

2. Babraham Research Campus, including land removed from the Green Belt, is allocated for mixed use development comprising:
- a. Within the employment-led development area, approximately 48,000 square metres gross internal area (GIA) additional research and development (Class (E(g)(ii)) floorspace;
 - b. Within the residential-led development area:
 - i. approximately ~~120~~ 83 additional Campus worker and affordable homes to support the needs of the Campus; and
 - ii. appropriate supporting ancillary uses and infrastructure, including ~~up to 430 additional~~ **approximately 850** square metres nursery space (class (F4E(f))), **and 500 square metres of flexible amenity space (Class F2 (a), (b), Class E (a), (b), (d))** ~~retail space (sui generis), and amenity space.~~
3. Development will be required to meet the National Planning Policy Framework (2024) 'Golden Rules' for land released from Green Belt **under paragraph 156.**, ~~including providing 50% affordable housing on residential schemes.~~

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

The change from 450 to 850 sqm for the nursery space reflects the most recent assessment work undertaken to support application 25/04634/OUT which includes for a purpose-built, modern and expanded facility to meet the growing needs of the Institute, Campus Staff and the local

community. It is anticipated that the new Nursery will provide pre-school care for up to 100 children.

The changes to the wording regarding the retail/amenity space is proposed in order to provide clarity as to the range of uses that could be accommodated and to reflect the most recent assessment work undertaken to support application 25/04634/OUT. It is envisaged that the facility will be a flexible and multi-functional space, providing opportunities for a variety of different activities to take place. This may include for a small retail element and/or gym for use by the Campus and the wider community.

The changes to the wording at part 3 are to ensure the policy simply refers to the ‘Golden Rules’ requirements set out under paragraph 156 of the NPPF (2024) (which expands beyond affordable housing).

The development of Babraham Research Campus must do the following (in accordance with the Spatial Framework):

Context

4. Through the preparation of a Landscape Visual Impact Assessment and Heritage Impact Assessment, **inform specific mitigations and** ; protect, and where appropriate, enhance the significance of heritage assets and their setting, including the Grade I Listed St Peter’s Church, Grade II* Listed Babraham Hall, **Babraham Conservation Area** and nearby ~~off-site~~ heritage assets.

~~5. Protect the legibility, appearance, and rural character of the Babraham Conservation area and the Lodge building, a non-designated heritage asset.~~

6. Limit development of new buildings to areas of existing development, undeveloped areas of land in the far north of the site, and The Close residential area. Gardens surrounding the Grade I Church and Grade II* Babraham Hall should be **retained as open space, as indicated on the Spatial Framework** ~~excluded from development.~~

7. Retain, preserve and enhance key ~~close-up~~ **short** and long-range views from, into and within the site, **as indicated on the Spatial Framework** ~~including facing west and east from Babraham Hall along The Avenue, and internal views of heritage assets and the formal gardens / open spaces to the south of the River Granta, by:~~

a. Ensuring ~~development~~ **buildings** sit below the **tree canopy; and** ~~existing tree line~~

~~b. Incorporating landscape and tree buffers, including forest scale trees and under storey planting where appropriate;~~

c. Responding sensitively to the setting of heritage assets within the site when redeveloping existing buildings; ~~and~~

~~d. Preparing a Views Analysis to inform specific mitigations.~~

8. Retain or, where possible, supplement the existing tree coverage **and landscape buffers** across the site, **including forest scale trees and under storey planting where appropriate**, to limit the visual impact of development on heritage assets, views and landscape setting.

~~9. In accordance with the Spatial Framework for the site, require a wide landscape buffer (minimum 20 metres) in/adjacent to any development in the north west of site in order to satisfactorily mitigate any adverse impacts of new development on the setting of the Cambridge~~

~~Green Belt and wider landscape character, whilst creating an attractive gateway into the campus from the north.~~

10. Apply the sequential approach to flood risk within the site, ensuring any development is subject to appropriate mitigation and does not increase flood risk elsewhere.

11. Given the known significant potential for archaeological remains in this area, development proposals must be accompanied by an appropriate archaeological assessment, which includes information on the significance of the heritage asset, including the extent, character and condition of the archaeological resource and the likely impact of the development on the archaeological remains.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous and has a clear purpose, as per requirements in paragraph 16 (d) and (f) of the NPPF (2024).

There are many instances where there is unnecessary duplication and where parts of the policy could be consolidated. In particular, in terms of assessment and mitigation of impacts upon the significance of heritage assets. This is especially important given that the policy currently extends to 30 parts across 5 pages, plus the Spatial Framework. There is also reference to the 'Lodge Building' but it is not clear which Lodge (there are two – Babraham Lodge and Linton Lodge). The suggested wording seeks to provide clearer wording and avoid duplication.

*The reference, at part 9, to a requirement for a '...wide landscape buffer (minimum 20 metres) in/adjacent to any development in the north-west of site...' is not considered to be justified or based on evidence. Indeed, the Cambridge Green Belt Study (2021) identifies that the Campus makes a relatively limited contribution to Green Belt purposes, and the harm of its release would be low. The policy also does not acknowledge the existing, established perimeter woodland belt that runs to the west and north of the proposed commercial development in the north of the Campus. This woodland belt is within the wider Campus estate and therefore within the ownership of the Campus and is proposed to be retained. The Campus would be willing for the perimeter woodland to form part of the Strategic Enhancement Area (S/SEA/BRC) as referenced at part 15 of the policy (see plan at **Appendix 2** of these representations). Therefore, in summary, the requirement for an additional landscape buffer of a minimum of 20 metres to the existing perimeter woodland belt is overly prescriptive and not justified by evidence. It should not be included on the Spatial Framework. Ultimately, this is a matter to be dealt with via detailed assessment (including a Landscape and Visual Impact Assessment) relating to a site-specific proposal as part of any planning application process.*

Built form

12. Ensure the built area of the ~~settlement~~ **Campus** is contained within the site allocation boundary shown on the policies map and the Spatial Framework Diagram. ~~Context~~

13. Be comprehensively planned and delivered to ensure development proposals are fully integrated with the wider Campus and to preserve and enhance the setting of identified heritage assets. This must involve:

a. Preparing a site-wide Masterplan, which must be submitted for approval by the Local Planning Authority as part of the first application for planning permission;

- b. Preparing a site-wide Design Codes for each phase of the development to ensure a high quality of development, which must be submitted and approved before the first reserved matters planning application is determined.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

With reference to part 13 (b) of the Policy, reference should be made to a Site-Wide Design Code as opposed to Design Codes for each phase of development. This is to ensure the Policy is not overly prescriptive and reflects the approach agreed with officers at Greater Cambridge Shared Planning (GCSP) service in respect of application 25/04634/OUT. The approach was to prepare a Site-Wide Design Code but which includes for site-wide coding as well as coding for the three character areas (residential, central and expansion area within north-west of campus). The Code also includes a section on phasing.

Part 14 of the policy is proposed as it is duplicated within both the employment-led development section (at part 23) and the residential-led section (at part 29).

Nature

14. Maintain and enhance the wider landscape within the Campus, including the corridor of the River Granta.

15. Deliver compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in the Strategic Enhancement Area (S/SEA/BRC), in line with a Green Belt Enhancement Strategy for the area prepared by the applicant. This should:

- a. include measures such as walking loops, new wetlands, restoration of ponds, and other associated green infrastructure projects;
- b. incorporate the enhancement of existing hedgerows and woodland that form the boundaries of the site, particularly to the east and west;
- c. ensure measures integrate with the green and blue infrastructure network across the site and in the wider area.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

Movement

16. Ensure proposals improve movement within the Campus and deliver connections to high-quality sustainable transport, by:

- a. securing improvements to pedestrian and cycle routes;
- b. supporting the provision of high-quality routes to existing forms of public transport, including nearby bus-stops;

c. **contributing to** ~~providing~~ high quality local non-motorised routes linking to Cambridge South East Transport schemes.

17. Where required, contribute financially to strategic public transport and active travel schemes in the south-east corridor, appropriate to the scale and nature of the development.

18. A trip budget based on detailed evidence must be agreed with the Local Highways Authority prior to submission of the outline application, **together with a strategic and local transport mitigation plan**. A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery.

~~19. To support delivery of the agreed campus-wide masterplan, a strategic and local transport mitigation plan must be prepared by the developer in consultation with the Local Highways Authority and Local Planning Authority.~~

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

The suggested wording seeks to provide clearer wording and avoid duplication.

The employment-led development must, additionally, do the following (in accordance with the Spatial Framework):

Uses

20. Support research and development (Class E(g)ii) floorspace and supporting uses. Future development proposals will need to deliver spaces for start-ups **and the Babraham Institute**, and these units should be located close to the centre of the site.

Built form

21. Be limited to the ~~employment~~ **commercial**-led development area identified in the Spatial Framework.

22. Encourage opportunities for collaboration between future occupants, **including communal space within the centre of the Campus designed for meeting, socialising and holding events** ~~including delivering communal facilities on the ground floors.~~

23. Be of high quality and innovative design which reflect the cutting-edge science which takes place within them whilst enhancing the heritage assets, preserving the rural character and sense of openness of the sites' context.

~~23. Deliver active ground floor uses and frontages wherever possible.~~

~~24. Respond positively to the site's immediate context, in particular heritage assets Grade I Listed St Peter's Church, Grade II Listed Babraham Hall, and their setting, wider landscape character and identified key views, through the selection of massing, material palettes and overall design of new research and development buildings.~~

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

The suggested wording above more clearly and accurately reflect up to date assessment work undertaken by the Campus to inform their future masterplan. This has been subject to discussion with officers at Greater Cambridge Shared Planning Service and has formed part of the proposals of application 25/04634/OUT. The suggested changes also avoid unnecessary duplication within the policy wording.

The requirement under part 23 to deliver active ground floor uses and frontages wherever possible is overly prescriptive. Ultimately, this is a matter to be dealt with via detailed assessment relating to a site-specific proposal as part of any planning application process. Furthermore, R&D buildings at the Campus cannot have an open door policy.

Public space

25. Include enhanced meeting places as part of the public realm and open spaces.

The residential-led development must, additionally, do the following (in accordance with the Spatial Framework):

Uses

26. Be limited to addressing the needs for campus worker housing, with the mix of typologies and tenures (including affordable housing) informed by an accommodation needs assessment for the campus, the Greater Cambridge Housing Strategy, and discussions with the Local Planning Authority.

27. Provide ancillary uses to meet the daily needs of residents, including a **new, expanded Nursery and a new amenity building capable of accommodating flexible space to address Campus and local needs, e.g** small shop and gym, **both of** which must be open to the wider public and not undermine the viability of existing services in the village.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

The suggested wording more clearly and accurately reflects up to date assessment work undertaken by the Campus to inform their future masterplan. This has been subject to discussion with officers at Greater Cambridge Shared Planning Service and has formed part of the proposals of application 25/04634/OUT.

Built form

28. Be located in the residential-led development area identified in the Spatial Framework.

~~29. Deliver active ground floor uses wherever possible.~~

30. Take a comprehensive, landscape-led approach to the design through the preparation of a Masterplan, which must be prepared by the applicant and submitted as part of the planning application for this part of the site. This must ensure development:

- a. maintains the low-density character of the site;
- b. secures building design which is sympathetic to the sensitive village-edge location; and
- c. focuses development as near to the Babraham High Street as possible.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous and has a clear purpose, as per requirements in paragraph 16 (d) and (f) of the NPPF (2024).

The requirement under part 29 to deliver active ground floor uses and frontages wherever possible is overly prescriptive. Ultimately, this is a matter to be dealt with via detailed assessment relating to a site-specific proposal as part of any planning application process. Furthermore, R&D buildings at the Campus cannot have an open door policy.

Spatial Framework (Figure 94)

4.3 The following changes are proposed to the Spatial Framework for Policy S/RSC/BRC: Babraham Research Campus (Figure 94);

- Updates to the proposed site allocation boundary to accurately reflect the Campus masterplan (see **Appendix 1** for updated site allocation boundary plan)
- Update to title of Figure 94 as per below:
'Figure 94: Spatial Framework for Policy S/RSC/BRC: Babraham Research Campus'
- Removal of 'Landscape Buffer' in north-west side of site (as referenced at Part 9 of Policy S/BRC)
- Removal of 'Commercial Led Development' blocks and simply refer to whole of this part of the Campus as 'Commercial Led Development' (as referenced at Part 21 of Policy S/BRC).
- Remove 'local nature reserve' labelling. This is incorrect and there is existing built development in these locations which should be acknowledged and shown on the plan and legend.
- Correctly show the alignment of the CSET Route. It is much further south than currently shown.
- Show the entirety of the Strategic Enhancement Area on the Plan and include additional land as per plan at **Appendix 2**.

Site Plan of Policy S/BRC: Babraham Research Campus (Figure 95)

4.4 The following changes are proposed to the Site Plan for Policy S/BRC: Babraham Research Campus (Figure 95);

- Updates to the site allocation boundary to accurately reflect the Campus masterplan (see **Appendix 1** for updated site allocation boundary plan)
- Update to title of Figure 95 as per below:

'Figure 95: Site Plan of Policy S/RSC/BRC: Babraham Research Campus'

Map of Green Belt release to enable delivery of Babraham Research Campus (Figure 96)

4.5 The following changes are proposed to the Map of Green Belt release to enable delivery of Babraham Research Campus (Figure 96);

- Updates to the site allocation boundary to accurately reflect the Campus masterplan (see **Appendix 1** for updated site allocation boundary plan)

5.0 Policy CC/DC: Designing for a changing climate

- 5.1 Babraham Research Campus Ltd **objects** to Policy CC/DC.
- 5.2 It will be important to ensure the policy enables sufficient flexibility to accommodate changes in climate change policy and good practice over the lifetime of the Plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes. The Local Plan will therefore need to build in suitable flexibility to accommodate these changes within the lifetime of the Plan.
- 5.3 The Plan will also need to be informed by a viability assessment to ensure that policies are achievable, and that the total cumulative cost of all relevant policies will not undermine deliverability of the Plan.

6.0 Policy CC/NZ: Net zero carbon new buildings

- 6.1 Babraham Research Campus Ltd **object** to Policy CC/NZ.
- 6.2 The policy goes above and beyond existing sustainability benchmarks without consideration for impacts on viability and deliverability. Whilst Babraham Research Campus Ltd welcomes the ambition to ensure that all buildings help to meet zero-carbon targets, there needs to be greater flexibility within the policy wording.
- 6.3 Firstly, requiring net zero operational emissions at the shell and core stage is not appropriate where the future end user and operational profile are not yet known. Such a requirement risks imposing impractical obligations and may deter occupier delivery or investment.
- 6.4 With regard to Part A, all new dwellings and non-domestic buildings are expected to achieve a space heating demand of 15-20 kWh per meter squared per year. This figure is in line with Climate Change Committee, LETI Net Zero definition and Passivhaus standard, which are higher than other national standards and therefore placing unrealistic expectations on developers.
- 6.5 With regard to Part B, the EUI targets are split between uses. For residential dwellings, the targets are set at 35 kWh per meter squared per year which is aligned with LETI Net Zero definition and the National Grid Future Energy Scenarios. The policy once again goes above and beyond national standards.
- 6.6 It is also understood that the Building Regulations Part L 2025 update/Future Homes Standard is due to include specific EUI targets once published. As EUI targets will be published in this legislation, it is suggested they are removed to ensure that the draft policy complies with NPPF 2026 draft policy PM13 (Setting Standards) and the now withdrawn PPG 1, which states that planning policies should not replicate matters already addressed by Building Regulations.

7.0 Policy CC/WE: Water Efficiency in new developments

- 7.1 Babraham Research Campus Ltd **object** to the proposed wording of Policy CC/WE.
- 7.2 The policy goes beyond national and industry guidance by effectively mandating rainwater or greywater harvesting on all major developments, which will not always be appropriate or deliverable. This is particularly the case for commercial led development, where such systems may conflict with operational requirements, site constraints, or viability. National policy promotes proportionate, context-led approaches to water efficiency.
- 7.3 The policy requires commercial units to achieve all five BREEAM water credits (WAT 01–05), with flexibility applied only to WAT 01. In practice, achieving all BREEAM credits is often challenging and may not be feasible in all circumstances. It is also noted that the remainder of the draft Plan is largely silent on BREEAM. As drafted, the policy would therefore require all commercial developments engage with a qualified BREEAM assessor to demonstrate the credits have been achieved, irrespective of scale or complexity, resulting in additional cost. This raises concerns regarding proportionality, particularly for smaller or less complex commercial schemes.

8.0 Policy CC/CE: Supporting a circular economy and sustainable resource use

- 8.1 Babraham Research Campus Ltd **object** to the proposed wording of Policy CC/CE.
- 8.2 Further clarity is requested on the policy wording. The policy states that proposals involving the demolition of a building, in whole or a significant part, should be accompanied by a full justification. Clarification is needed on what constitutes 'a significant part' to avoid ambiguity.
- 8.3 While the emphasis on retrofit is supported, the policy does not appear to allow for other material benefits that may outweigh the presumption in favour of repairing, refurbishing, and re-using. It is recommended that the policy acknowledges that, in certain circumstances, demolition may be acceptable where justified by wider planning benefits. For example, there are sometimes instances where buildings cannot deliver a flexible/adaptable, compliant and fit for purpose R&D facility and demolition and replacement is the only option.
- 8.4 Flexibility should also be added to the policy to make it clear that if the viability and deliverability of refurbishment, retrofit or reuse places considerable is place in such doubt, then demolition and redevelopment is the only realistic option for the Site.

9.0 Policy BG/TC: Improving tree canopy cover and the tree population

- 9.1 Babraham Research Campus Ltd **object** to Policy BG/TC.
- 9.2 The statutory requirement to deliver a minimum 10% Biodiversity Net Gain already provides a robust, outcome-based mechanism for securing ecological enhancement. This framework is flexible, evidence-led and capable of responding to site-specific circumstances. The proposed tree canopy requirement appears to duplicate or cut across the BNG regime, without sufficient justification, and risks prioritising a single ecological metric over a balanced planning judgement.
- 9.3 The requirement for major development to demonstrate a minimum of 30% tree canopy cover on site risks introducing an inflexible and prescriptive constraint that could undermine development capacity, density and viability. As such, it is not aligned with national planning policy or with the Government's stated ambition for growth. It is overly prescriptive and there is insufficient evidence for its justification. It is also unclear whether other practicalities have been considered, i.e off-set from street lights, SUDS roads and/or foundations.
- 9.4 The policy and supporting text state that canopy cover should be calculated using a Council-approved calculator or metric. However, neither the policy itself nor the Biodiversity and Green Spaces Topic Paper identifies what calculator or methodology is intended to be used. In the absence of a defined and agreed approach, the policy lacks clarity and certainty. On this basis, it does not meet the tests and is not justified.

10.0 Policy BG/EO: Providing and enhancing open spaces

- 10.1 Babraham Research Campus Ltd **object** to the proposed wording of Policy BG/EO.
- 10.2 The policy introduces a requirement for open space associated for commercial developments without clarity on the quantum required. The policy is insufficiently flexible and does not reflect the operational and spatial requirements of employment and commercial development.
- 10.3 The National Planning Policy Framework (2024), including the direction of travel set out in Policy L2 of the reformed NPPF, is clear that planning policies should support economic growth and make effective use of land in sustainable locations. Applying a generic open space expectation to commercial development risks constraining efficient site layouts and reducing development capacity, contrary to national policy and the Government’s stated ambition to support growth in the commercial sectors, as set out in Policies E1–E3 of the reformed NPPF.
- 10.4 Policy BG/EO should therefore be reconsidered to allow open space provision to be assessed on a case-by-case basis, adopting a flexible and proportionate approach that recognises the functional requirements of employment uses and aligns with national policy on effective land use, economic growth and plan deliverability.

11.0 Policy J/AW: Affordable workspace and creative industries

- 11.1 Babraham Research Campus Ltd **object** to the proposed wording of Policy J/AW.
- 11.2 The requirement for affordable workspace would significantly affect scheme viability for schemes that are already facing viability constraints. In light of the requirement for thousands of new jobs in Greater Cambridge, this would severely impact the number of schemes coming forward to deliver this level of growth.
- 11.3 In its current format, the policy is unclear on the scale and nature of the employment floorspace this would apply to which makes it difficult to comment on the impacts. It is acknowledged that a number of affordable workspace policies exist in London where land values and construction costs are high making the delivery more feasible. However, even in these circumstances, scheme viability is greatly compromised.
- 11.4 It is suggested that if the policy were to be carried forward, then a viability clause should be added in. This could allow for negotiated contributions and provide justification for the alternative delivery mechanisms outlined in the policy such as off-site provision, or financial payments where on-site affordable workspace is not feasible.
- 11.5 It is also noted that at point 2b, the policy allows affordable workspace to be managed and operated by the owner where they can demonstrate the necessary skills and experience. Given the absence of existing guidance, it should be clarified how an owner would demonstrate competence to deliver affordable workspace effectively. Affordability also comes in many forms. For example, at Babraham Research Campus they have a 'Live Labs' scheme whereby new start-ups rent bench space and desk space underpinned by the support services running that facility. The company/individual enters into a facility agreement to use the space. For start-ups in other buildings, they benefit from more flexible lease terms (shorter leases and break terms).

APPENDIX 1

POLICY S/BRC – UPDATED SITE ALLOCATION BOUNDARY



KEY

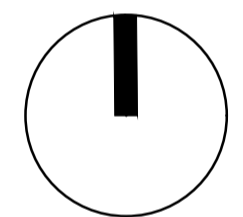


CURRENT BOUNDARY OF POLICY S/BRC:
BABRAHAM RESEARCH CAMPUS



PROPOSED AREAS OF EXTENSION OF
BOUNDARY OF POLICY S/BRC:
BABRAHAM RESEARCH CAMPUS

North Arrow



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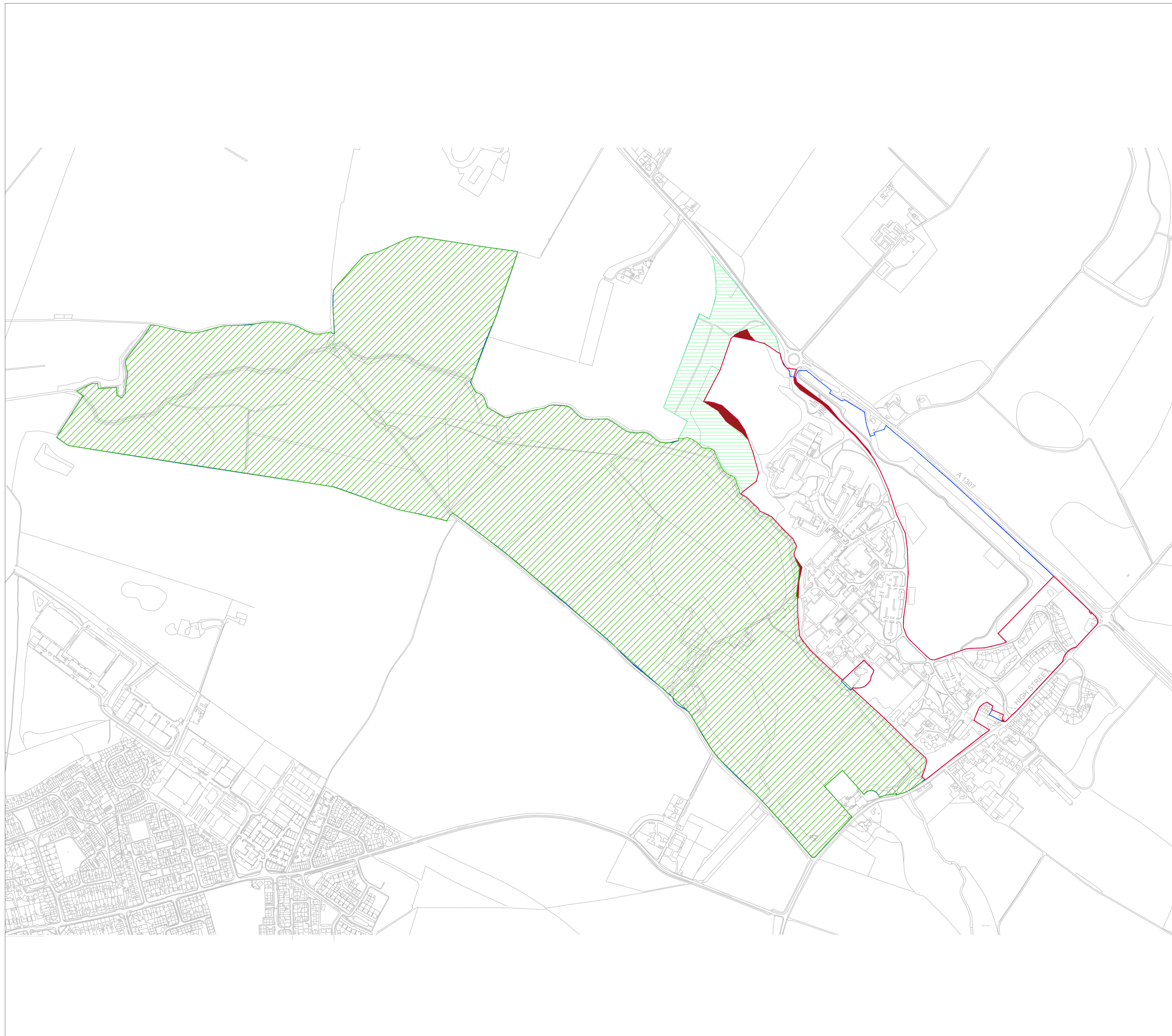
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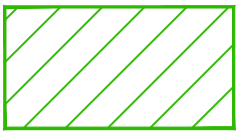



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Project BABRAHAM RESEARCH CAMPUS	
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Drawing No. 500	Rev.

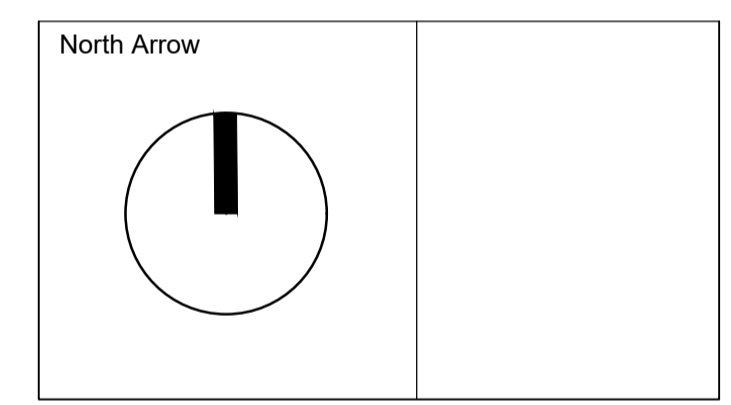
APPENDIX 2

POLICY S/BRC – UPDATED SITE BOUNDARY OF STRATEGIC ENHANCEMENT AREA



KEY

	CURRENT STRATEGIC ENHANCEMENT AREA (SEA)
	EXTENDED STRATEGIC ENHANCEMENT AREA (SEA)
	CURRENT BOUNDARY OF POLICY S/BRC: BABRAHAM RESEARCH CAMPUS
	PROPOSED AREAS OF EXTENSION OF BOUNDARY OF POLICY S/BRC: BABRAHAM RESEARCH CAMPUS



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Sheet Status INFORMATION	
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Drawing No. 501	Rev.



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