

Para / ref	Suggested amendments to wording	Comment / Explanation
3.2.18	<p>The Cambridge Biomedical Campus is of national importance. This policy will guide development within the existing campus and also identifies <u>additional</u> land to be released from the Green Belt for <u>expansion</u> a future phase. It establishes requirements for a new masterplan which will secure a coordinated approach to infrastructure, services and facilities to meet the needs of campus users, to ensure a campus which can deliver high quality local <u>and regional</u> health services as well as complete internationally as a centre of research <u>and innovation</u>.</p>	<p>The term “future phase” should be replaced with “expansion” to avoid the potential inference that the development of the expansion land should only occur after the existing Campus has been regenerated. Expansion will provide both essential infrastructure and funding contributions towards campus enhancements - it is necessary for expansion to come forward alongside the further development of the Campus.</p> <p>This approach is illustrated in Section 3.4 of the Spatial Framework (October 2023, updated July 2025), which has previously been submitted to the GCSP. This is also acknowledged in part 27(c) of the draft policy, on which specific comments have been made.</p> <p>The additional proposed amendments to the text are:</p> <ul style="list-style-type: none"> - To recognise that the health services serve more than the local community; - To fix a typographic error in the word “complete”; and - To recognise that the Campus is internationally recognised as a centre of research and innovation, which more accurately reflects the breadth of work carried out at the Campus.
Policy S/CBC; Cambridge Biomedical Campus (Including Addenbrooke’s Hospital)		
1.	<p>The Biomedical Campus including the land allocated for expansion through release of land from the Green Belt as shown on the Policies Map, is appropriate for a mix of uses which meet local, regional or national health care needs; or for <u>life sciences</u>, biomedical and biotechnology research and development activities, related higher education, and sui generis medical research institutes. The Campus will include provision for <u>an innovation hub</u>, <u>visitor accommodation</u>, additional campus worker homes and <u>other</u></p>	<p>University of Cambridge strongly support the overall vision for CBC. However, we recommend including an explicit reference to “life sciences” to ensure the full scope of work undertaken at the Campus is accurately reflected. This proposed amendment aligns with the uses outlined in paragraph 2 of the draft policy.</p> <p>Additionally, the suggested references to “an innovation hub” and “visitor accommodation” are important to highlight, given the significant</p>

	<p>supporting services and facilities to support those that work, live, visit and pass through the Campus.</p>	<p>benefits these elements will bring to the Campus and its wider community.</p> <p>The policies map should also be updated to identify the 'Landscape Improvement Area' to the south east of the Campus to be consistent with the policy wording and the indicative spatial framework.</p>
<p>Vision and identity</p>		
<p>2.</p>	<p>The Cambridge Biomedical Campus will continue to evolve as a globally significant centre of healthcare, research and innovation, where clinical, academic and commercial activities collaborate seamlessly to improve lives. Anchored by three leading NHS teaching hospitals (Addenbrooke's Hospital, the Rosie Hospital and Royal Papworth Hospital), the Campus will remain a nationally significant centre for specialised patient care while driving forward advances in life sciences that benefit communities locally, nationally and internationally.</p>	<p>The Campus is home to three teaching hospitals: Addenbrooke's Hospital, the Rosie Hospital and Royal Papworth Hospital.</p>
<p>3.</p>	<p>As one of Europe's largest centres for health, life sciences and clinical research, the Campus brings together leading NHS teaching hospitals, world-class academic institutions and a concentration of global life science businesses in a way rarely matched elsewhere. This close integration creates a unique advantage with the ability to rapidly translate discoveries into clinical practice and patient care. Future development will protect and strengthen this relationship, maximising opportunities to bring people together in a range of shared spaces and facilities to promote collaboration and foster an active, connected research community across the Campus. Ultimately, this will help to ensure the Campus continues to be a world-leading location for healthcare, education, medical innovation and life sciences research.</p>	
<p>4.</p>	<p>The Campus will also grow to form a vibrant and sustainable Cambridge neighbourhood, capitalising on its highly accessible location. It will be a high quality and vibrant place to live, visit and work. Further development, on both the existing campus and the expansion land, will deliver high-</p>	

	quality buildings, spaces and infrastructure, including a range of on-site services and facilities, that reflect both its international importance and its strong connections to the wider city and sub-region by walking, cycling and high quality public transport.	
7.	Areas to the south of the Campus in the Cambridge Green Belt will be enhanced to provide additional green space, landscaping and biodiversity improvements to mitigate the impact of development and enhance its wider setting <u>where any such benefits cannot reasonably be accommodated on site</u> .	The proposed amendment will ensure that in a scenario where the green infrastructure needs of the Campus can be met on site, that the requirement to improve the areas to the south of the Campus does not unduly persist.
Uses		
8.	Land at the Cambridge Biomedical Campus as shown on the Policies Map and indicative Spatial Framework, including land removed from the Green Belt adjoining Babraham Road, is allocated for a mix of uses contributing to health and life sciences, commercial, <u>education</u> and innovation floorspace, including:	The provision of higher education uses within the Campus is a key component of its offer and success. The proposed amendment ensures that this is recognised.
8. a.	Healthcare provision serving local, <u>regional and</u> to international needs, including new and updated NHS buildings and supporting clinical infrastructure;	
8. b.	<u>b</u> Biomedical, biotechnology and life sciences research and development, including <u>commercial uses, academic institutions</u> and medical research institutes;	The University considers that it is premature to set out a floorspace figure at this stage and that the scale of development at the Campus should be determined by physical and infrastructure constraints such as building heights, the trip budget, and land availability. These constraints require further assessment and current work does not support a defined minimum or maximum. Flexibility to optimise land at the Campus is essential, as its success depends on achieving an efficient density and co-locating a diverse mix of uses in close proximity to foster innovation. Given that land has been released from the Green Belt to facilitate this, it remains critical

		<p>that the available land be used as efficiently as possible.</p> <p>If a figure is to be included, then it would need to recognise the flexibility that the University would wish to see on its plots to determine the appropriate mix of academic and commercial lab/office development which has always been the intention in development of the emerging Spatial Framework.</p> <p>A floorspace figure for healthcare provision has not been included. It is essential that the scale of new healthcare buildings be determined by the specific operational requirements of the Trust, the model of care to be delivered, and the clinical and spatial standards that apply at the time of design. These factors cannot be meaningfully fixed at this stage.</p> <p>As is common practice for applications at the campus and to reflect work undertaken by LCG, plant has been excluded.</p> <p>We recommend including an explicit reference to commercial uses to ensure the full scope of work undertaken at the Campus is accurately reflected.</p> <p>A reference to use classes is not necessary and may unduly limit the scope of potential uses. For example, research and innovation spaces will need office accommodation, which may fall under Use Class E(g)(i). These uses should not be considered unacceptable, rather they are an essential component of the Campus. Flexibility is particularly important given the evolving nature of life sciences research, which is increasingly associated with AI and data-driven methodologies. As a result, there may be a shift from traditional wet lab facilities to dry lab environments.</p>
8. c.	Higher education <u>uses (academic teaching and research)</u> and training	

	facilities supporting the development and retention of healthcare related skills and talent; <u>and</u>	
8. e.	Approximately 687,000 net additional square metres (Gross Internal Area) of research and development floorspace (use class E(g)(ii)) specifically related to, biomedical and biotechnology uses, and clinical healthcare and hospital facilities.	See explanation at paragraph 8(b).
10.	Given the range of existing and proposed uses and the 24 hour nature of <u>at</u> the Campus, a <u>comprehensive framework</u> Amenity Strategy is required to achieve a thriving and world leading place. Supportive and ancillary uses such as hotels, conference centres, nurseries, sports, leisure, food and beverage, convenience retail, community gardens and food-growing spaces are required <u>across the campus</u> to achieve this, and proposals will need to:	<p>The requirement for a Framework Amenity Strategy for the Campus is supported. However, we do not agree with describing the Campus as a “24-hour” community. While the hospitals operate around the clock, these activities do not generate a night-time economy. Paragraph 10(a) appropriately requires the Amenity Strategy to accommodate those users that are on the Campus during night hours, but any further references risk undermining the effectiveness of the Amenity Strategy.</p> <p>The term “comprehensive” has also been deleted as it could be misinterpreted as implying a level of detail that is not intended at this stage. We do not consider this to be the intention of the draft policy as such an interpretation would be inconsistent with the ongoing work required to establish a framework of principles and strategies to guide the Campus’s expansion and regeneration. The revised wording therefore seeks to clarify this position.</p> <p>We note that the delivery of new homes on the Campus, as set out in paragraphs 8(d) and 11(e) will support a strengthened amenity offer by increasing the demand for diverse services and facilities.</p> <p>The additional reference to the delivery of ancillary uses “across the campus” is considered necessary to clarify that new spaces will be provided on the existing campus as well as on expansion land.</p>
10. b.	Provide services and facilities which are appropriately located across	A well-designed masterplan for the Campus should intentionally

	<p>the Campus, in particular at key areas of activity, to reduce the need for people to travel <u>off the Campus</u>;</p>	<p>promote interaction between people who live, work, and visit there. An approach that focuses solely on reducing the need to travel to access services and facilities, such as by providing self-contained amenities within individual buildings, could have the unintended consequence of limiting opportunities for such interaction. The additional text therefore seeks to address this issue and ensure that the core principle of bringing people together to create a successful innovation ecosystem is not inadvertently undermined.</p> <p>This ambition is consistent with the approach that is being taken to enhance interaction in Phase 2 where movement between buildings is essential.</p>
11. e.	<p>Primarily serve CUH/NHS campus workers including medical students. Short term accommodation for patients and/or their families, or for non-CUH/NHS campus workers, <u>housing for those employed by a corporation or institution that is resident within the Campus, including visiting and temporary workers and technical staff collaborating or partnering or exchanging with organisations on the campus or life science organisations in the immediate South Cambs cluster,</u> may be acceptable where this is not prioritised or over provided relative to CUH/NHS accommodation;</p>	<p>This amendment is seeking to bring greater clarity and a clearer definition to the type of housing that can be acceptably delivered within the Campus.</p>
12. h.	<p>Mixed use buildings that include incubator spaces to support research and development (class E(g)ii) floorspace and supporting uses.</p>	<p>Wording changed for the same reasons are set out in the comments against part 8 of the draft policy.</p>
<p>The development of Cambridge Biomedical Campus must do the following:</p>		
<p>Context</p>		
14.	<p>Adopt a design-led approach to the planning and design of further development at the Campus ensuring its setting within Cambridge's urban</p>	<p>The University support the requirement for a design-led approach to the expansion and regeneration of the Campus, which will help to</p>

	<p>and rural edge is respected <u>whilst optimising the use of the developable land within the Campus boundary</u>. To achieve this, development must <u>should</u> align with the <u>indicative</u> Spatial Framework <u>and/or agreed framework masterplan</u> for the Campus and must <u>should</u> also:</p>	<p>optimise the use of the land and ensure that the Campus continues to function as a world-leading centre of healthcare and scientific excellence. Additional wording is proposed to reinforce this approach and to ensure that available land is not underutilised.</p> <p>Part 8 of the draft policy refers to the Spatial Framework as being indicative. This is appropriate, as the Spatial Framework is necessarily a high-level document that illustrates a potentially acceptable approach to the design and development of the Campus. It should not, and cannot, be interpreted as a definitive or prescriptive blueprint for development.</p> <p>Requiring that development “must” be in accordance with the Spatial Framework would therefore be unjustified and unhelpfully restrictive. More flexible wording is proposed to allow the GCSP to consider alternative proposals in the future, where these are appropriately justified. Importantly, this flexibility would not prejudice GCSP’s decision-making.</p> <p>Reflecting this approach, reference is made to the Campus-wide masterplan required under part 27(a) of the draft policy, which is to be submitted to and approved by GCSP. It is possible that such a masterplan may diverge from the indicative Spatial Framework.</p> <p>Where any such divergence is considered acceptable and is approved by GCSP, the policy should not act as a barrier to development proposals that accord with the approved Campus-wide masterplan.</p>
14. a.	<p>Integrate sensitively with adjoining residential neighbourhoods, the wider Green Belt, and countryside to the south, ensuring appropriate transitions in height, scale, and landscaping <u>without infringing on the optimisation and functionality of land within the Campus</u>;</p>	<p>The University understand and agree that the Campus should be a “good neighbour” to its surroundings, including both the adjacent open countryside and residential communities. However, for reasons set out above, it is essential that the land available within the Campus is used as effectively as possible and that what constitutes an “appropriate transition” is considered within this context.</p>

14. b.	<p>Retain and, <u>where practical</u>, enhance key strategic and local views and landscape features, especially from Nine Wells Local Nature Reserve, Magog Down and wider countryside approaches;</p> <p><u>Retain and enhance local landscape features, especially Nine Wells Local Nature Reserve</u>; and</p>	<p>As currently drafted the wording seems to conflate the value of Nine Wells Local Nature Reserve (which is an important ecological feature but not one from which there are particularly sensitive or important views) and the key strategic and local views from Magog Down and the wider countryside. The proposed amendments seek to bring clarity to this, so that appropriate mitigation measures can be put in place.</p>
14. c.	<p><u>Seek to respect and respond</u>. Contribute positively to the setting of designated and locally listed heritage assets and enhance the interface between the built form and its natural context; and</p>	<p>To ensure that the policy is effective and not overly prescriptive, amendments are proposed to avoid requiring enhancement in every circumstance. High-quality design does not always mean visible “enhancement” of views.</p> <p>The amended wording aligns with a design-led, context responsive approach and allows the decision-maker to weigh site-specific factors (e.g., land availability, essential clinical/research floorspace, critical infrastructure) in the planning balance, which would ensure the policy is effective.</p>
14. d.	<p>Respect the operational needs of existing NHS and institutional facilities and mitigate any adverse impacts on surrounding communities.</p>	
Built form		
16.	<p>Respect and <u>seek to</u> enhance local landscape, townscape and heritage and adopt principles of high quality design by:</p> <p><u>a) optimising the efficient use of land through a design-led approach that responds positively to the strategic importance of the site;</u></p>	<p>As per comments against part 14(c) of the draft policy.</p> <p>It is essential that the policy recognises that land optimisation will sometimes require development forms, scales, or configurations that do not enable the enhancement of all existing views into or across the site. While the enhancement of views and visual amenity is an important consideration, it should not be treated as an absolute requirement where this would unduly constrain development or lead to the</p>

		<p>underutilisation of land that is critical to delivering the Campus's wider strategic objectives.</p> <p>The proposed amendments do not seek to diminish the importance of good design, landscape integration, or the mitigation of visual impacts. Rather, they introduce a more balanced and realistic policy approach that is positively prepared and justified, reflecting the strategic importance of the Campus and the real-world constraints on land availability. The amendments would enable site-specific decision-making, while remaining consistent with national policy by promoting high-quality design, appropriate mitigation, and the efficient use of land.</p> <p>In particular, the amendments acknowledge that in certain locations, where land availability is limited and demand for development is exceptionally high, optimising land use may necessitate careful trade-offs. In such circumstances, it may not always be possible or appropriate to achieve net enhancements to views, provided that any adverse impacts are appropriately mitigated through high-quality design, layout, and placemaking.</p>
16. d.	<p><u>e) Where practical, viable, and in the public interest,</u> prioritising the retrofit and reuse of buildings, especially where they are of heritage or operational value;</p>	<p>Draft Policy CC/CE(d) recognises that, in certain circumstances, proposals for demolition may deliver benefits that outweigh the carbon savings associated with retaining the existing building. It is also recognised in supporting text paragraph 3.2.23 that many of the older buildings in the Campus are in need of renewal. Given the very substantial benefits related to the growth of the Campus, it is in the public interest to ensure the most efficient and effective use of the land can be achieved. This may, in some cases, necessitate the demolition of existing buildings. Accordingly, amendments are proposed to more closely align part 16(d) of this policy with the approach set out in Draft</p>

		Policy CC/CE.
Nature		
Public space		
19. d.	Accessible spaces to promote wellbeing, social interaction and collaboration <u>for the benefit of all campus users</u> ; and	
Movement		
20. c.	<u>As a long term solution, which is recognised as being dependent on the redevelopment of Addenbrooke's in phases and subject to grant funding,</u> providing enhanced access to Cambridge South Station through a new east-west 'high street' for active travel and buses and a mobility hub adjacent to the station. <u>Interim solutions that can be delivered to improve pedestrian connectivity earlier in the development programme should be explored;</u>	<p>The University supports the ambition for an east-west street; however, it is essential that the policy recognises that its delivery is likely to occur at a later stage in the overall development programme. Initial feasibility testing has demonstrated that delivery of the east-west street is contingent upon the total relocation of existing intensive care units and operational theatres currently blocking the route. This will necessitate the construction of new hospital buildings elsewhere within the Campus to accommodate those critical functions. Only once these facilities have been successfully relocated could the existing buildings be demolished, reconfigured, or otherwise adapted to enable the delivery of the street.</p> <p>As a result, the precise timing of delivery remains uncertain and will inevitably be long term. In order for the policy to be considered effective and deliverable over the plan period, flexibility must be embedded within the policy wording. This flexibility should acknowledge the complex dependencies and allow for appropriate interim solutions that enable pedestrian connectivity to come forward until such time as the east-west street can be fully delivered.</p>
20. e.	Incorporating-Exploring opportunities for <u>consolidating</u> delivery <u>of goods including</u> through last-mile logistics, including dynamic kerbside management and future technologies;	<p>The trip budget will incentivise the LCG to consolidate deliveries and servicing trips in and out of the Campus so far as is practically possible. The proposed amendments seek to recognise this and give additional flexibility to exactly how that is achieved. This flexibility is needed to both</p>

		reflect the many uses that will be operating within the Campus but also the rate of technological change that may well provide not-yet anticipated ways of consolidating delivery and servicing trips.
20. f.	Enabling new multi-modal access from a realigned Granham's Road to relieve-avoid and mitigate the worsening congestion on Babraham Road and Hills Road whilst implementing measures that seek introducing a modal filter south of Dame Mary Archer Way to prevent the rat-running manage the through traffic of private vehicles through the Campus;	The introduction of a modal filter south of Dame Marcher Way is not part of the Transport Strategy that the LCG has formulated to date and indeed could undermine the benefits that the southern access road is intended to deliver, which would make the policy ineffective. Any such modal filter would prejudice the new access's ability to relieve congestion on the Addenbrooke's roundabout and Hills Road. It should therefore be sufficient for the policy to set out the ambition but remain agnostic as to how it is achieved.
20. g.	Consolidating new or re-provided car parking into mobility hubs, limiting new permanent surface parking, and providing high-quality cycle parking, shared mobility infrastructure, and accessible transport for all users;	There is existing car parking that policy cannot compel its users to give up. The additional wording therefore clarifies that the requirement to consolidate parking should only apply to new or re-provided parking. This proposed amendments also seek to provide flexibility for temporary or surface car parking to be delivered as a 'meanwhile' use as has been successfully done at the Campus before. We support the use of innovative techniques to deliver safe and accessible cycle parking.
20. i.	Implementing data capture devices such as Automatic Number Plate Recognition (ANPR) that can monitor freight activity across the campus, allowing for the analysis of impacts of freight, and to support a policy framework of measures that seeks to optimise freight activity as the campus expands; and	Amendments are seeking to make the application more flexible in how any analysis is implemented.
21.	The current agreed vehicular trip budget for the Campus is 2,800 arrivals and 850 departures in the AM peak, and 850 arrivals and 2,400 departures in the PM peak. A revised trip budget based on detailed evidence must be reviewed and any changes be agreed with the Local Highways Authority prior to as part of planning applications for further development. The trip budget	The wording has been restructured to clarify that the trip budget figures represent a current position only and will evolve as more detailed evidence becomes available over time, particularly through new planning applications.

	<p>will be cognisant of both capacity and previous planning approvals and allocations. The current agreed trip budget for the Campus is 2,800 arrivals and 850 departures in the AM peak, and 850 arrivals and 2,400 departures in the PM peak. A monitor and manage approach will be taken to ensure that the development <u>overall</u> remains within the agreed trip budget for the site throughout its delivery.</p>	<p>Additional wording is proposed to make clear that the trip budget is not intended to be an absolute cap on daily vehicle trip numbers, nor over short and medium periods of time. Such an approach would be impractical to manage, difficult to enforce and could undermine the effective operation of the Campus. For the trip budget to be effective it must be sufficiently flexible and capable of responding to changing circumstances. This includes allowing for exceedances over defined periods, providing there is a clear and agreed mechanism for monitoring performance and for bringing trip generation back within the agreed range over time. A rigid, inflexible cap would risk rendering the policy ineffective in practice.</p> <p>The proposed approach is consistent with the arrangements for Waterbeach, where appropriate controls and review mechanisms have been secured through the section 106 agreement.</p>
22.	<p>To support delivery of the agreed campus-wide masterplan, <u>planning applications should be supported by</u> a strategic and local transport mitigation plan must be prepared by the developer(s) in consultation with the Local Highways Authority and Local Planning Authority. This must include:</p>	<p>Additional text is proposed to make clear that it should be through planning applications that the transport mitigation plan is prepared and submitted to local planning authority. It is only at this stage that there will be the necessary level of detail available to ensure that any such plan can be effective and deliverable. It is also important that the plan is able to take account of committed schemes that may affect the transport strategy.</p>
22. d.	<p>Potential delivery via a Section 106 agreement or CIL.</p>	<p>The allowance for contributions to be secured via section 106 contributions <u>or</u> a CIL payment is supported. Policy should provide flexibility to enable infrastructure to be delivered in a timely, efficient, and proportionate manner, reflecting site-specific circumstances and viability considerations.</p>

Resources

24.	Contribute to the efficient use of resources and the long-term sustainability of the campus by incorporating other low-carbon energy infrastructure and circular economy principles wherever possible practical and viable .	The LCG are committed to delivering sustainable development that reduces carbon impact. However, the use of the word ‘possible’ implies that such principles and measures should be used in all circumstances where it is physically possible to do so. Recognition must be given though to the budget constraints that healthcare development is under, and that whilst it may be possible to deliver certain measures from an engineering or technological perspective, the cost of doing so may not be feasible. The amended text provides some greater flexibility to allow for such scenarios to be accommodated.
25.	Planning for necessary services, facilities and infrastructure, identified in the Amenity Strategy and Infrastructure Delivery Strategy, must be undertaken in a comprehensive manner, ensuring their timely and efficient delivery to avoid overburdening existing services and in particular prioritising seeking early delivery of green infrastructure, sustainable transport links and essential utilities.	<p>The University considers that the Amenity Strategy and Infrastructure Delivery Strategy should be comprehensive and give clear commitments on the timely delivery of amenities for the campus, open spaces/green infrastructure and sustainable transport proposals.</p> <p>To date the draft Infrastructure Delivery Strategy is suitably resolved and therefore whilst we are supportive of the principle of expanding the campus, we remain concerned to ensure it is done in the most appropriate way, with phased and timely delivery of infrastructure, amenity provision and open space.</p> <p>There remains a lack of clarity on the phasing and delivery aspects of the expansion proposals. The Development Strategy section of the plan states that:</p> <p>‘To meet the future needs of the campus and to enable the improvement of the existing campus the Draft Local Plan identifies the release of an area of green belt south of the campus, accompanied by enhancement of green spaces and the landscape adjoining it. However, development will only be allowed if it is accompanied by the right infrastructure, that will deliver the range of supporting services, facilities and infrastructure that workers, visitors and residents need that deliver the goal of making it a world class campus.’</p>

		<p>To gain greater confidence that expansion of the campus will deliver the desired objectives the University feels that greater focus is needed in this section of the policy to ensure a coordinated approach to the masterplan, its infrastructure, and the timing of delivery to ensure that all development that comes forward is capable of and contributes the wider vision set out in the plan.</p> <p>The University remains willing to engage in overcoming these concerns and will continue to work with partners and the Greater Cambridge Shared Planning Service to help shape the Infrastructure Delivery Strategy, and importantly the legal mechanisms to secure delivery.</p>
Lifespan		
26.	Further phases of major development at Cambridge Biomedical Campus, including the further extension to the south, must be planned and delivered in a comprehensive and coordinated manner to ensure the vision for the site is successfully achieved, contributing to the long-term, coordinated evolution of the Campus through a comprehensive and enforceable spatial approach.	
27.	There are a range of matters that will need to be fully addressed before further development will be supported. To address these, the applicant must prepare and submit, for approval as part of future outline planning applications:	<p>The University is supportive of the wording here to fully address these issues before further development is to be supported.</p> <p>The University are concerned that if key principles are not resolved at a masterplan level, there is a risk that the desired outcomes will not be achieved.</p> <p>We are clear that this will necessitate considerable work to agree the principles of the framework masterplan, the transport strategy, detailed triggers for delivery of key items, but in the absence of a clear agreed plan, of what each parcel of land should contribute towards in</p>

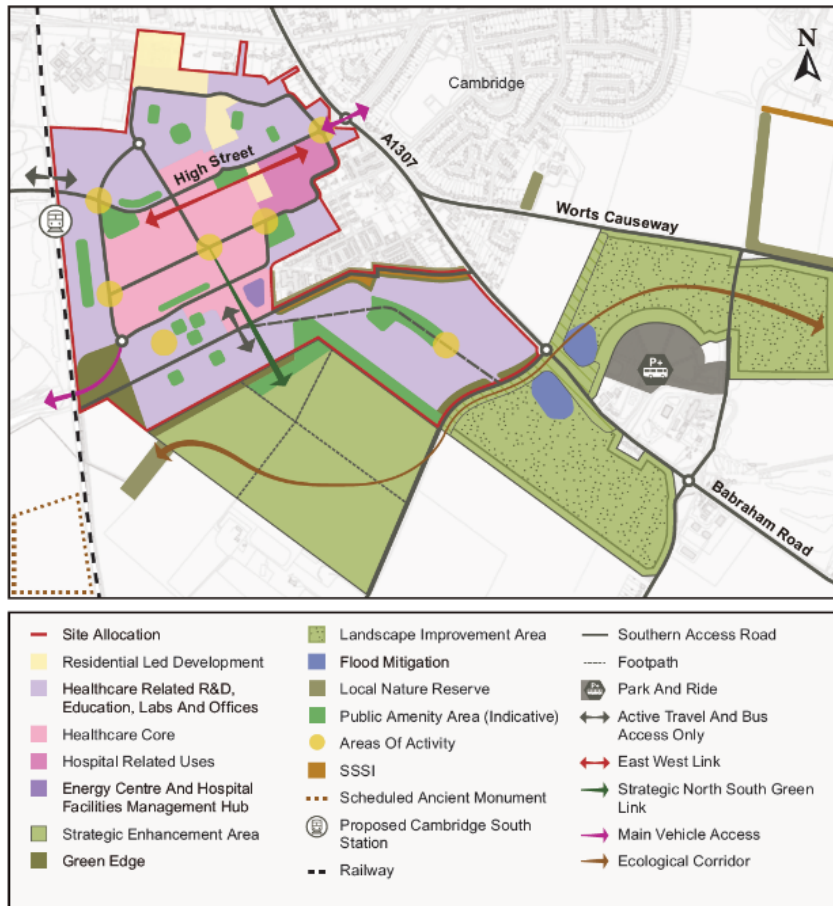
		<p>terms of the overall objective, we are concerned that the outcome will risk being sub-optimal.</p> <p>We accept that this may then need to flex over time, but we need a clear start point, where the expectations of each phase or parcel of land are clear, both in terms of its physical contribution to the masterplan, but also financial or other expectations towards infrastructure, or apportionment of trips (within the trip cap) or parking spaces.</p> <p>This should create an imperative for all parties to commit to this work early, to create a clear framework (with appropriate flexibility) within which individual applications can be brought forward</p>
27. a.	A comprehensive campus-wide Framework Masterplan which addresses key requirements, such as access and movement, land uses, green and blue infrastructure, scale and massing and densities;	<p>Whilst this necessitates an amount of joint working between all parties, we will need to reach agreement on a framework masterplan (with appropriate flexibility) to guide individual applications for major development as they come forward.</p>
27. c.	Full Framework Phasing Plan(s) , including any further planned development or redevelopment in early phases of the Campus and measures for the phasing plan to be updated from time to time in agreement with the local planning authority ;	<p>The word 'full' implies a level of detail and granularity that will go beyond what is possible or even appropriate for an outline planning application. As set out above, for the phasing of the Campus' expansion and regeneration to be successful it must be a 'live' plan that is able to react to events as they occur. Establishing a 'full' phasing plan at the outset of a 25+ year development programme is neither practical nor desirable, and so alternative and additional wording is suggested to ensure that it can be effective.</p>
27. d.	A business case for a phased approach to achieving opportunities for long term and wider collaboration for delivering freight and logistics across the campus and through an off-site micro-consolidation and logistics hub ;	<p>The requirement to consider ways to consolidate logistics and servicing trips associated with the Campus is already covered by part 20(e) and the need to adhere to a trip budget. It therefore does not need to be repeated here.</p>

27. e.	<p>An Infrastructure Delivery Strategy, identifying required site-specific and strategic infrastructure requirements to help achieve the vision for the Campus as well as wider Campus enhancements set out in the Spatial Framework <u>Framework Masterplan</u>, and demonstrating how this can be successfully funded and delivered through enforceable mechanisms for the coordinated and phased development of the Campus. It must identify appropriate triggers to ensure the timely provision of infrastructure to align with development phasing;</p>	<p>The Spatial Framework in the GCLP (Figure 63) shows one way in which the Campus could be effectively regenerated and expanded. It is described in paragraph 3.2.19 as being “indicative high-level”. It should not be mistaken for a definitive blueprint, and therefore reference to the “Campus enhancements set out in the Spatial Framework” should instead refer to the same as set out in the Framework Masterplan. That is the much more appropriate reference point for what should be delivered.</p> <p>There remains a lack of clarity on the phasing and delivery aspects of the expansion proposals. The Development Strategy section of the plan states that:</p> <p>‘To meet the future needs of the campus and to enable the improvement of the existing campus the Draft Local Plan identifies the release of an area of green belt south of the campus, accompanied by enhancement of green spaces and the landscape adjoining it. However, development will only be allowed if it is accompanied by the right infrastructure, that will deliver the range of supporting services, facilities and infrastructure that workers, visitors and residents need that deliver the goal of making it a world class campus.’</p> <p>To gain greater confidence that expansion of the campus will deliver the desired objectives the University feels (consistent with Cambridge University Hospitals NHS Foundation Trust and CBC Limited), that greater focus is needed in this section of the policy to ensure a coordinated approach to the masterplan, its infrastructure, and the timing of delivery to ensure that all development that comes forward is capable of and contributes the wider vision set out in the plan.</p> <p>The University remains willing to engage in overcoming these concerns and will continue to work with partners and the Greater Cambridge Shared Planning Service to help shape the Infrastructure</p>
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		Delivery Strategy, and importantly the legal mechanisms to secure delivery.
28.	Applications for full planning permission and/or reserved matters applications must be supported by <u>evidence of how the proposals accord with the relevant framework controls and details of how they will contribute to the delivery of a high quality Campus overall.</u> subsequent parameter plans, phase or plot specific masterplans and design codes, to ensure different phases of development integrate seamlessly and contribute positively to the overall design quality. In part, this should be informed by a Landscape Visual Impact Appraisal and Heritage Impact Assessment	<p>The wording here is not clear and needs to be revised.</p> <p>Reserved matters applications are required to be made in accordance with the outline permission to which they are pursuant and should not themselves require parameters or design codes (instead they should demonstrate how they comply with such as set by the 'parent' outline permission).</p> <p>The same goes for full planning applications which do not need parameters and design codes because they are made in detail.</p> <p>The requirement for applications to be submitted with a LVIA and a Heritage Impact Assessment is unnecessary; applications will need to be made in accordance with the local planning authority's validation requirements.</p>
Supporting information		
3.2.19	The spatial framework for the Cambridge Biomedical Campus sets out an indicative high-level illustration of the policy requirements and the key interventions required to deliver a world leading life science Campus.	<p>We acknowledge GCSP's desire to include a spatial framework (figure 63) but we are concerned that it may appear more prescriptive/precise than the stage of the process we are at. This creates an unnecessary risk that inevitable changes to the framework (as may be agreed by the collective parties and GCSP) will be seen as being in conflict with this diagram.</p> <p>Its status therefore needs to be clear and more emphasis given to the indicative, high level and early stage indication of how development may come forward.</p>
3.2.20	Cambridge Biomedical Campus is a location of national and international importance for life sciences, biomedical and healthcare research and development. It plays a critical role in providing and innovating medical	

	<p>care and services across local, regional and national contexts. The site brings together NHS services, world-leading academic research, medical innovation, and commercial life sciences in a single, integrated environment. As such, it represents a vital economic and social asset not only for Greater Cambridge, but for the country as a whole.</p>	
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Figure 63: Spatial Framework for Cambridge Biomedical Campus (including Addenbrooke's Hospital)



Comments on the Spatial Framework are as follows:

- The key appears to indicate there is a SSSI between the expansion land and Knightly Avenue. This is not the case. The closest SSSI is Cherry Hinton Chalk Pits; there should be no SSSI shown within or adjacent to the Campus.
- The colours used for the Green Edge and Local Nature Reserve are too similar and easily mistaken for one another.
- There is no need to show the flood mitigation on the Spatial Framework. They will be the result of flood risk modelling and will in any case be dry most of the time.
- There are no existing footpaths in the locations shown in the Strategic Enhancement Area directly south of Phase 3. Whilst new footpaths could be created in those areas, the same is true of the SEA areas to the south of Phase 4 and surrounding Babraham Park and Ride and indeed the entirety of the Campus. It may be misleading therefore to only show footpaths in the land south of Phase 3. The preference would be to remove them entirely.
- The hatched areas surrounding the flood mitigation areas do not appear in the key.
- The word '(indicative)' should be removed from the Public Amenity Area. As is noted throughout the draft policy, the Spatial Framework is a high-level indication of how the Campus could be regenerated and expanded. Marking only one element of it as indicative risks the other elements seeming more fixed than they are presumably intended to be.
- The word 'Proposed' can be removed before 'Cambridge South Station'. The station is due to be operational before the adoption of the GCLP.

		<ul style="list-style-type: none">- The main vehicle access shown on Addenbrooke's Road should be bidirectional like it is at the Hills Road entrance.- The southern access road should be shown as a main vehicle access point.- The 'Active Travel and Bus Access Only' labels should be removed. The need for these to be modal filters is not yet clear nor justified.- The High Street/ East West Link remains a long term ambition (rather than a deliverable short term priority). We feel that the diagram or key should be clear about this to manage wider expectations about its delivery.
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