

Subject: S/CBC – Pemberton Family representation
From: Bidwells Planning
Date: 30/01/2026



CBC EXPANSION LAND – REPRESENTATION – THE PEMBERTON FAMILY

This paper forms a representation to the Regulation 18 January 2026 consultation to the emerging Greater Cambridge Local Plan (GCLP) on behalf of the Pemberton Family and Pemberton Family Trusts (“the Pemberton Family”).

It is a submission focussed on the proposed allocation (ref: S/CBC) ‘Cambridge Biomedical Campus (including Addenbrooke’s Hospital)’.

The Pemberton Family is the landowner of a major part of the allocation area and remains a committed member of the ‘Cambridge Biomedical Campus Landowners Collaboration Group (LCG)’ and to continuing to work together as group to achieve a deliverable development.

Attached to this representation is a copy of the representation to the plan prepared by Cambridgeshire County Council (as landowner) and Prologis. The Pemberton Family support the overall approach to the policy set out by the attached representation. There are, however, two matters at part 7 and Part 17d of the policy where the Pemberton Family requires a detailed amendment to the policy to ensure the effective use of land and to ensure a sound allocation that involves the release of Green Belt land. The representations made in this document are matters only related to these two key planning matters.

The Pemberton Family has been a long-term stakeholder in the successful development of Phases 1 and 2 of the campus and as owners of land and interests required for its further expansion, they offer strong support to the overall policy and the continued recognition by the emerging Local Plan of the important role of the Cambridge Biomedical Campus and its future growth.

This representation refers to some detailed policy points that are requested to be changed and in the context of a Local Plan representation they have been lodged as ‘objections’, notwithstanding the overarching support to the policy.

The submission is structured to address only those parts of Policy S/CBC upon which a comment is made.

Part 1 - Cambridge Biomedical Campus (including Addenbrooke’s Hospital) - OBJECT

Part 1 references the Policies Map and the land to be allocated. The Policy, Spatial Framework and the Proposals Map all need to align and be consistent and accurate in how they represent the land and allocation.

The Spatial Framework is clear that part of the site is ‘Strategic Enhancement Area (SEA)’ and another part of the site is ‘Landscape Improvement Area (LIA)’. The policy refers to these areas separately and places different policy expectations on these different parts of the site. It is important that all Local Plan plans or diagrams that present the site graphically show and designate these two areas (LIA and SEA) separately.

Part 17.d – Nature - SUPPORT

Support is given to the recognition of the role that the Strategic Enhancement Area can offer to the overall delivery of the site, including a well vegetated landscape buffer. If an amendment is made to this clear and appropriate policy position it would attract an objection. It is important that planning policy strives for the effective use of land in accordance with Section 11 of the National Planning Policy Framework; the policy must ensure the development potential of the allocation area is optimised and so ensure the SEA is effectively used to provide for mitigation features that would be better placed in the SEA, such as recreation, significant tree belts and landscape enhancement.

Part 18 – Proposals in the Landscape Improvement Area - OBJECT

The Landscape Improvement Area (LIA) is a large swathe of land on the Figure 63 Spatial Framework, but the Part 18 policy requirements for it are linear features or drainage features. Such items will not require the full extent of the LIA and will be a matter for detailed design at the appropriate time. As such, for the policy to include:

The LIA provides an extensive swathe of land to allow space and flexibility for how the required features will sit within the LIA

Part 18 – Proposals in the Landscape Improvement Area - OBJECT

There should be a section 18a to cover proposals in the Strategic Enhancement Area.

It is helpful that the policy has a section dedicated to the Landscape Improvement Area to give precision and clarity for how this particular land parcel is to perform as part of the wider allocation. Separately the Strategic Enhancement Area (SEA) has various requirements set through the policy and so a comparable section in the Policy would bring appropriate precision and clarity to this particular land parcel. Additional wording to the policy to include:

Proposals in the Strategic Enhancement Area should come forward in conjunction with the site allocation and must:

- a. Provide a landscape buffer to the south of the campus that responds positively and sensitively to the existing topography and landscape character, establishing a soft-green edge to the City.
- b. Protect and enhance green infrastructure including hedgerows, woodlands, waterbodies and protected species. Measures that support restoration, improve ecological connectivity and benefit nature recovery, including conservation farming, will be supported.
- c. Contribute, where appropriate, to protect or enhance Strategic Views and integrate built form into the landscape.
- d. Demonstrate how it will contribute to flood risk mitigation through site-specific multifunctional sustainable drainage and nature-based solutions.
- e. Utilise Green Belt Land to create a multi-functional landscape that further supports biodiversity, with recreation as an important secondary function.

The matters a-e are informed by the Council's Habitat Regulations Assessment (2025) and the Site Allocations Topic Paper (2025) alongside the evidence submitted that forms the 'Third Party Comments' for Cambridge Biomedical Campus (CBC Landowner Collaboration Group and CBC Ltd). In particular the evidence presented in the 'Emerging

Spatial Framework: Visual Commentary, October 30th 2023', 'CBC Preliminary Ecological Appraisal – Part 1, December 2022', 'CBC Case for Expansion, December 2022' and 'Cambridge Biomedical Campus Vision 2050: Creating a life sciences quarter for Cambridge'.

To support the allocation and the exceptional reasons for releasing land from the Green Belt it is important that the National Planning Policy Framework (NPPF 2024) is adhered to:

Paragraph 151

Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply.

Paragraph 156

Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b. necessary improvements to local or national infrastructure; and*
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.*

The NPPF sets a requirement for the provision of new or improved green spaces that are accessible to the public where major development is to be delivered on land released from the Green Belt. This relates to development that includes housing, which the S/CBC allows for. To ensure a robust and sound allocation it requires appropriate new or improved green spaces. Due to the extent of land to be released from the Green Belt, the SEA is required to contribute to the provision of green spaces and ensure there is a sound and NPPF compliant allocation beyond any space which could be accommodated within the existing campus or built-up area of the campus expansion land.

The SEA has an integral and coordinated role to contribute to the delivery of the allocation, especially to underpin a sound release of land from the Green Belt.

**APPENDIX 1 – COPY OF CAMBRIDGESHIRE COUNTY COUNCIL AND PROLOGIS REG 18
REPRESENTATION**



Note

Draft Greater Cambridge Local Plan – Representations on behalf of Cambridgeshire County Council and Prologis

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 a future phase</u>. 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.



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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, visitor accommodation</u>, additional campus worker homes and <u>other</u> supporting services and facilities to support those that work, live, visit and pass through the Campus.</p>	<p>We 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 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>
Vision and identity		
2.	<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 <u>three leading NHS teaching hospitals (Addenbrooke’s Hospital, the Rosie Hospital and Royal Papworth Hospital)</u>, 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>We support this wording. Describing CBC as ‘globally significant’ is an accurate reflection of its international standing. The unique mix of uses at the Campus make it a world-leading centre of research, development, and medical application. The policy rightly recognises this position and sets an appropriately defined context for expansion of the Campus.</p> <p>The Campus is home to three teaching hospitals: Addenbrooke’s Hospital, the Rosie Hospital and Royal Papworth Hospital.</p>



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3.	<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>	
4.	<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, <u>on both the existing campus and the expansion land</u>, will deliver high-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.</p>	Additional words for clarity.
5.	<p>The Campus will deliver a coherent and legible environment, utilising high-quality materials, landscaping and public realm that reflect the character of Cambridge and promote wellbeing, collaboration and innovation. Development will improve the navigability of the Campus and provide a range of services, facilities and green spaces that meet the needs of patients,</p>	



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	<p>staff, residents and visitors as well as being well integrated with surrounding neighbourhoods and the wider community. The Campus will include shared spaces promoting interaction between people across firms and sectors, promoting the sharing of ideas, where firms locating here are joining an active research community.</p>	
6.	<p>Excellence in placemaking, sustainability, health and wellbeing will underpin this approach, ensuring the Campus remains not only a cornerstone of the UK's health and life sciences leadership, but also a positive and exemplary part of Cambridge's future.</p>	
7.	<p>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>.</p>	<p>We support the identification of land to the south of the Campus for green infrastructure enhancements, including open space and biodiversity. Our current understanding is that it may be difficult to achieve the necessary net gain in biodiversity and all amenity provision within the Campus' expanded boundary. This may change, however, and if it does become possible, then the clear direction in legislation and policy is for those benefits to be provided onsite so far as possible.</p> <p>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.</p>
<p>Uses</p>		



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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>Approximately 500,000 net additional square metres (Gross Internal Area, excluding plant) of b</u> Biomedical, biotechnology and life sciences research and development, including <u>commercial uses, academic institutions</u> and medical research institutes;	<p>We propose that paragraph 8(e), which states a floorspace figure for research and development and healthcare uses <u>only</u> (excluding higher education, leisure, hotels, and other supporting uses), be deleted and additional text be included at paragraph 8(b) instead. This provides greater clarity on what the floorspace figure relates to by confirming that it applies only to specific uses and that other uses would be additional.</p> <p>The amended text intentionally presents an indicative, rounded figure to act as a broad guide to potential growth, avoiding any false precision implied by the previous figure, which was based on an early, high-level design study.</p> <p>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</p>



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		<p>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 that the available land be used as efficiently as possible.</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 the Landowner Collaboration Group (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. Reference to academic institutions has been removed as this is captured under paragraph 8(c).</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>
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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. d.	Capacity for approximately 1,0 <u>3</u> 00 additional homes on the campus.	The LCG's evidence base submitted to GCSP identifies an opportunity to deliver approximately 1,000 additional homes on the Campus. We are therefore very supportive of this element of the draft policy. However, we propose an amendment to increase the indicative number of units to allow greater flexibility for additional homes to be delivered on the expansion land, provided they satisfy the tests in part 11 of the draft policy. A range of housing typologies and tenures will benefit the campus as a whole.
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).
9.	Development proposals must make a positive and meaningful contribution to it becoming a world leading healthcare, life-science and educational cluster.	
10.	Given the range of existing and proposed uses and the 24 hour nature of at the Campus, a <u>comprehensive framework</u> <u>Amenity Strategy</u> is required to achieve a thriving and world leading place. Supportive and	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



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	<p>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>	<p>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. a.	<p>Support the needs of the campus users throughout the day and night;</p>	
10. b.	<p>Provide services and facilities which are appropriately located across the Campus, in particular at key areas of activity, to reduce the need for people to travel <u>off the Campus</u>;</p>	<p>A well-designed masterplan for the Campus should intentionally 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</p>



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		<p>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>
10. c.	Ensure they do not compromise the operational needs of the Campus;	
10. d.	Enhance the vibrancy of the Campus and the visitor, patient and employee experience	
11.	To support the housing needs of those working on the Campus, the development and/or intensification of plots within the existing Campus for residential uses will be supported where they:	<p>The majority of housing delivered on the Campus will be located within the existing boundaries and will be provided by CUH to meet the needs of CUH and wider NHS campus staff. However, there is also an aspiration to enable the delivery of build-to-rent homes for Campus workers within the expansion land. This would help to reduce trips to and from the Campus and respond to the well-evidenced challenges faced by Campus workers in securing affordable homes close to their place of work. The proposed changes are essential to provide clarity that housing delivery may occur not only through the intensification of existing plots but also through new development, ensuring flexibility to meet future needs.</p>



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11. e.	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;	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.
11. f.	Provide opportunities for co-living, supporting community cohesion;	
11. g.	Support campus vitality, with appropriate design;	
11. h.	Provide necessary services and infrastructure that are within close proximity;	
11. i.	Do not compromise healthcare operations or clinical safety.	
12.	Applications for development will also be supported for:	
12. j.	The progressive renewal of NHS estate buildings;	
12. k.	The delivery of infrastructure to support hospital operations including helipad for the <u>Helicopter Emergency Medical Services East Anglian Air Ambulance</u> ;	



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12. h.	Mixed use buildings that include incubator spaces to support research and development (class E(g)iii) floorspace and supporting uses.	Wording changed for the same reasons are set out in the comments against part 8 of the draft policy.
The development of Cambridge Biomedical Campus must do the following:		
Context		
13.	Ensure the built area of the Campus is contained within the Site Allocation boundary identified on the Policies Map. Beyond this, other associated uses and mitigation may be provided in the Strategic Enhancement Area, including drainage, habitat compensation, <u>sustainable and active travel infrastructure, access works</u> and, in appropriate locations open space. <u>Any departures from this approach will be considered on their merits against the relevant planning tests, including Green Belt.</u>	<p>We recognise and support the principle, and accept and support the need to limit the footprint of the campus, however there may be occasions where a different approach is required, for example proposals for a temporary helipad in advance of the permanent roof mounted helideck on campus.</p> <p>The policies map should be updated to show the 'Landscape Improvement Area' to the south east of the Campus to ensure it is consistent with the policy wording and the indicative spatial framework.</p>
14.	Adopt a design-led approach to the planning and design of further development at the Campus ensuring its setting within Cambridge's urban 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>	We support the requirement for a design-led approach to the expansion and regeneration of the Campus, which will help to 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.



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	also:	<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.	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> ;	We 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



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		“appropriate transition” is considered within this context.
14. b.	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; <u>Retain and enhance local landscape features, especially Nine Wells Local Nature Reserve</u> ; and	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.
14. c.	<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	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. 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.
14. d.	Respect the operational needs of existing NHS and institutional facilities and mitigate any adverse impacts on surrounding communities.	



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15.	To maximise the potential for collaboration and ingenuity across the Campus, proposals for shared infrastructure, including affordable lab space, innovation hubs and <u>residential</u> accommodation that promotes inclusion and affordability, will be supported.	To bring greater clarity to the draft wording.
Built form		
16.	Respect and <u>seek to</u> enhance local landscape, townscape and heritage and adopt principles of high quality design by: <u>a) optimising the efficient use of land through a design-led approach that responds positively to the strategic importance of the site;</u>	As per comments against part 14(c) of the draft policy. 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 underutilisation of land that is critical to delivering the Campus's wider strategic objectives. 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. In particular, the amendments acknowledge that in certain locations,



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		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.
16. a.	b) Aligning with design principles that respond to local character and the city's townscape, using varied building forms and typologies to deliver high design quality, architectural features and materials;	
16. b.	c) Where appropriate, providing active ground floor uses to activate streets, spaces and communal areas <u>whilst recognising the physical (vibration etc) advantages of enabling R&D uses to exist at ground floor level;</u>	The use of "where appropriate" is essential and must be retained to provide the necessary flexibility for some buildings to use the ground floor for scientific equipment that must be located at that level.
16. c.	d) Supporting appropriately sited taller buildings where they enhance legibility, mark key destinations, and do not adversely unacceptably impact sensitive views, heritage assets and their setting or neighbouring communities;	The policy wording should recognise that the proposals will bring about a substantial amount of change, and that some of these changes may adversely affect views or heritage assets (for example). Those adverse effects may not be severe or significant, however, and even in instances where they are, are still capable of being found acceptable depending on the nature of the proposals.
16. d.	e) <u>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;	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



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		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 Policy CC/CE.
16. e.	f) Achieving high standards of energy and environmental performance, including climate resilience;	
16. f.	g) Responding sensitively to adjoining Green Belt and residential areas through scale transitions and soft landscaping buffers;	
16. g.	h) Ensuring boundary treatments, lighting, servicing and operational layouts are designed to minimise negative impacts and contribute to the overall public realm.	
Nature		
17.	Establish a strong, varied and well connected framework of accessible green infrastructure optimising biodiversity value and integrating nature-rich open spaces and ecological corridors throughout the site. The design of such spaces must ensure:	
17. a.	delivery of biodiversity enhancements, while accommodating appropriate amenity, recreation, and wellbeing functions;	



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17. b.	habitat features are, where possible, embedded within development parcels, enhancing the southern green edge and providing multifunctional landscapes that balance ecological protection with informal play, sport, and relaxation, supporting both campus users and the surrounding community;	
17. c.	existing agricultural, grassland and woodland habitats are enhanced, improving ecological links between Nine Wells LNR and Gog Magog Hills;	
17. d.	provision of a well vegetated landscape buffer within the Strategic Enhancement Area (S/SEA/CBC) to the south of the campus that responds positively and sensitively to the existing topography and habitats, including planting of native species, wetlands, woodland and hedgerows.	We support the requirement for a well vegetated landscape buffer that will achieve the purposes listed at paragraph 17.d. The proposed amendment provides flexibility for the most appropriate location to be determined, either within the SEA or on the edge of Phase 3 and Phase 4, as the Campus masterplan is developed. The amendment is required to ensure the landscape buffer is deliverable on land controlled by the owners of Phase 3 and 4.
18.	Proposals in the Landscape Improvement Area must:	
18. a.	Create and/or enhance existing ecological corridors between the nature reserves of Nine Wells and Beechwoods;	
18. b.	Establish high quality active travel routes from Limekiln Road into the southern end of the Campus;	
18. c.	Incorporate natural drainage features which specifically addresses surface water flood risk associated with the expansion land north	



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	of Granham's Road.	
Public space		
19.	Provide a network of world class, coherent, well-designed and high-quality public and communal spaces, taking a holistic Campus wide approach to ensure a range of user needs are addressed, including amenity spaces for employees and visitors and spaces and facilities to support accelerated patient recovery, and to maximise delivery of complementary biodiversity enhancements. This will be achieved by provision of:	
19. a.	A well-connected network of open spaces, squares and courtyards, all within walking distance of campus users, that are proportional in size and function to the number of people working, visiting or passing through these areas;	
19. b.	Safe, inclusive and accessible public spaces that can be used at any time;	
19. c.	Coherent signage to improve wayfinding and legibility, including within buildings , helping to create a sense of place;	The signage provided within buildings is not a planning matter.
19. d.	Accessible spaces to promote wellbeing, social interaction and collaboration <u>for the benefit of all campus users</u> ; and	
19. e.	Carefully landscaped campus edges to create a green transition to from the city to the surrounding countryside, integrating the Campus with its surroundings, helping to reduce the visual and operational	



Note continued

	impact, and supporting the setting of Nine Wells and the Green Belt.	
Movement		
20.	Deliver an exemplar approach to movement and transport within and through the site, promoting sustainable, inclusive access by:	
20. a.	Prioritising walking, cycling, and public transport as the primary means of access with legible high quality street network in accordance with <u>Healthy Streets guidance</u> and <u>National Design Guidance</u> ;	
20. b.	Delivering a safe, legible and accessible internal movement network, with a clear active travel hierarchy and infrastructure improvements to key routes including Francis Crick Avenue, Dame Mary Archer Way, Robinson Way and Puddicombe Way;	
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> ;	We support 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



Note continued

		<p>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. d.	<p>Providing sufficient capacity to accommodate travel improvements and connectivity to existing nearby Park and Ride sites at Babraham Road, Trumpington Road and other travel hubs;</p>	
20. e.	<p>Incorporating <u>Exploring opportunities</u> for <u>consolidating</u> delivery <u>of goods including</u> through last-mile logistics, including dynamic kerbside management and future technologies;</p>	<p>The trip budget will incentivise the campus stakeholders 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 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.</p>
20. f.	<p>Enabling new multi-modal access from a realigned Granham's Road to relieve-avoid and mitigate the worsening of congestion on Babraham Road and Hills Road whilst <u>implementing measures that seek introducing a modal filter south of Dame Mary Archer Way to prevent the rat running manage the through traffic</u> of private vehicles</p>	<p>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</p>



Note continued

	through the Campus;	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 <u>new or re-provided</u> car parking into mobility hubs, limiting new <u>permanent</u> surface parking, and providing high-quality cycle parking, shared mobility infrastructure, and accessible transport for all users;	<p>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. These 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.</p> <p>We support the use of innovative techniques to deliver safe and accessible cycle parking.</p>
20. h.	Ensuring blue light routes maintain prioritised access to key hospital departments;	
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 <u>policy</u> framework <u>of measures</u> that <u>seeks to</u> optimise freight activity as the campus expands; and	Amendments are seeking to make the application more flexible in how any analysis is implemented.
20. j.	Implementing a monitored and enforceable peak-hour trip budget, supported by demand management measures and high-quality mobility services such as employee-specific buses, that prioritises modal shift and monitors ongoing performance.	



Note continued

21.	<p>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 <u>must be reviewed and any changes be</u> agreed with the Local Highways Authority prior to as part of planning applications for further development. <u>The trip budget will be cognisant of both capacity and previous planning approvals and allocations.</u> 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>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> <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.</p> <p>A rigid, inflexible cap would risk rendering the policy ineffective in practice.</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. a.	Sustainable transport measures;	
22. b.	Indicative costings;	



Note continued

22. c.	Phasing; and	
22. d.	Potential delivery via a Section 106 agreement or CIL.	The allowance for contributions to be secured via section 106 contributions or 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.
Resources		
23.	Utilise innovative approaches to water management on-site, including sustainable drainage systems (SuDS), water reuse and natural systems and landscaped solutions <u>as appropriate to the function of the buildings and landscape</u> , to help address flood risk, including surface water, foul drainage and sewage disposal, and maximise the sustainability of the Campus.	The scope for water re-use in healthcare is extremely limited. Additional text is proposed to recognise this, and that any such approaches to water management will have to be cognisant of the types of uses it is supporting.
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 <u>possible practical and viable</u> .	We 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.



Note continued

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.	What constitutes ‘timely’ delivery will vary depending on the nature of the infrastructure and the feasibility of doing so will depend on the delivery partner. The last two subclauses are therefore suggested for removal, as the wording that comes before them sufficiently sets the expectation that infrastructure should be delivered in a timely and efficient manner.
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.	Future outline planning application(s) should be supported by 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:	We recognise that, in order to make the best use of the opportunity presented, a clear overarching framework is required to guide the regeneration and expansion of the Campus. Such a framework will help to optimise land use and ensure that placemaking and infrastructure are delivered to a standard and quality befitting a campus of international significance. However, the refinement of this framework will necessarily take time and, to be effective, it must remain a ‘live’ document capable of evolving over the lifetime of the development.



Note continued

		<p>It would be inappropriate to assume that the matters listed in this part of the draft policy can be 'fully addressed' in a single, fixed framework. Given the diversity of uses and the development timeframes such an approach is neither practical nor desirable. It is expected that updates and the addition of detail will be necessary over time.</p> <p>The policy should allow sufficient flexibility for the local planning authority to consider details ahead of or in parallel to a planning application to avoid delaying the submission of time critical applications. This is particularly relevant to applications for healthcare facilities which are reliant on specific funding windows. Similarly, opportunities to attract a landmark, footloose occupier, such as a major international corporation or a national or international research institution, could be lost if development is delayed pending the approval of detailed document.</p> <p>Policy should actively seek to avoid such outcomes. Simpler and more flexible wording is therefore recommended. In such circumstances, it would be incumbent on the applicant to justify why the proposal should be considered in advance and to demonstrate how the proposals would not prejudice the realisation of the overarching vision for the Campus. The policy should therefore give the local planning authority the scope to consider proposals based on their merits, including before outline planning application(s) are approved.</p>
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Note continued

		<p>The requirement appears to be consistent with the provisions at part 28 of the draft policy, which allow for full planning applications to be made.</p>
27. a.	<p>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>	<p>As above, the benefit that a campus-wide masterplan can play in ensuring the best possible outcomes is understood and appreciated. The LCG has prepared a draft Spatial Framework supported by robust assessment and evidence. The level of detail is extensive and the LCG consider it to be the first step towards the preparation of a campus-wide Framework Masterplan which confirms principles and a general approach to development. It is not expected to be a highly detailed document: designing a detailed masterplan at the outset of a 25+ year development programme is neither practical nor desirable and would risk the policy being undeliverable.</p> <p>We support the requirement to be the output of a planning application rather than something that should necessarily precede one.</p> <p>The proposed amendments are to reflect other comments made above, namely that ‘comprehensive’ could be misinterpreted to mean detailed. If it is intended to mean a masterplan that relates to the entire campus, this is already covered by the fact it should be a ‘campus-wide masterplan’. Positing the masterplan as a ‘framework masterplan’ much more closely reflects the type of information that it should be containing, which should be about key requirements,</p>



Note continued

		principles and objectives. A flexible masterplan can react to changes in physical and market circumstances and it allows the local planning authority to make decisions based on up to date information.
27. b.	Evidence to demonstrate an understanding of the cumulative needs of people working, visiting and living on the campus, and the infrastructure, services and facilities necessary to deliver a world leading campus, and how these needs will be met, including proposed phasing and funding approach;	As above.
27. c.	Full Framework Phasing Plan(s) , including any further planned development or redevelopment in early phases of the Campus <u>and measures for the phasing plan to be updated from time to time in agreement with the local planning authority</u> ;	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.
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 ;	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.
27. e.	An Infrastructure Delivery Strategy, identifying required site-specific and strategic infrastructure requirements to help achieve	The Spatial Framework in the dGCLP (Figure 63) shows one way in which the Campus could be effectively regenerated and



Note continued

	<p>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>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>Other proposed amendments are only to simplify the wording and make the text more concise.</p>
27. f.	<p>Clear and enforceable strategies for delivery, management and stewardship of shared facilities and public realm <u>in the proposed application area</u>;</p>	<p>The proposed amendment clarifies that future strategies should apply to the area covered by the application. While coordination across the wider campus is encouraged where possible, it is unlikely that existing management strategies can be revised.</p>
27. g.	<p>A Community Engagement Strategy, maintained and submitted alongside future planning applications to meaningfully enable local people and stakeholders to inform site wide and phase/neighbourhood specific proposals;</p>	
27. h.	<p>Where appropriate, a Meanwhile Strategy, identifying opportunities for the meanwhile use of buildings, facilities and other spaces to make efficient use of land while it is awaiting longer-term development.</p>	
28.	<p>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</u></p>	<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</p>



Note continued

	<p>to the delivery of a high quality Campus overall. 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>	<p>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>
<p>Supporting information</p>		
<p>3.2.19</p>	<p>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>	<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>
<p>3.2.20</p>	<p>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 care and services across local, regional and national contexts. The site brings together NHS services, world-leading</p>	



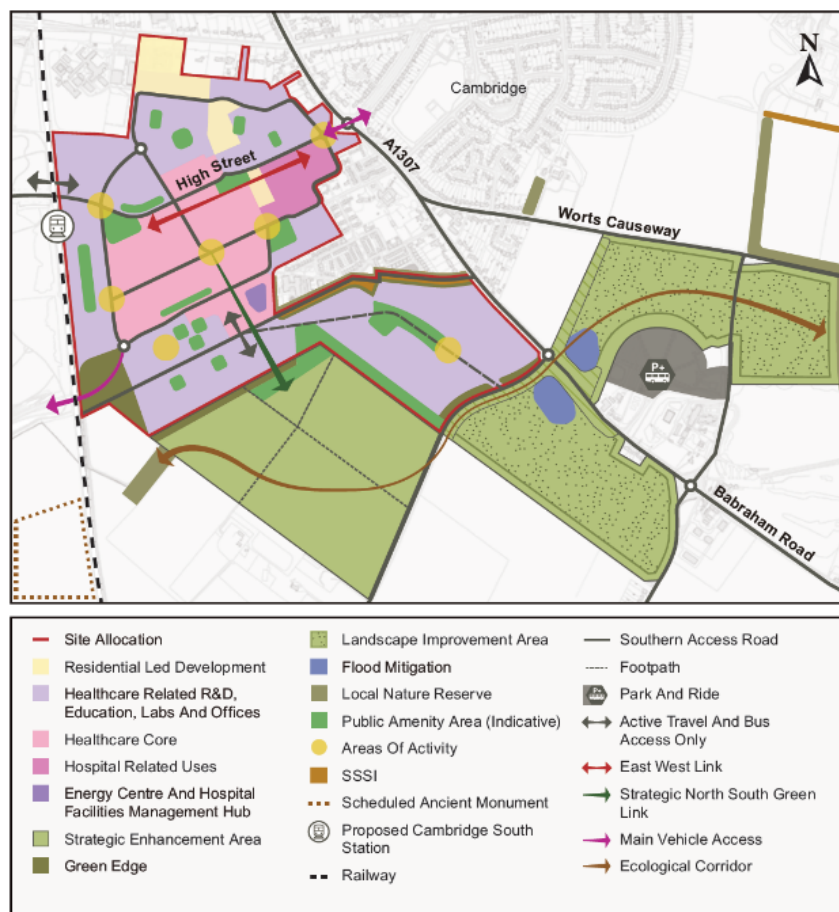
Note continued

	<p>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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Note continued

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



Note continued

		<p>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.</p> <ul style="list-style-type: none">- The word 'Proposed' can be removed before 'Cambridge South Station'. The station is due to be operational before the adoption of the GCLP.- 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 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.
3.2.21	<p>This policy is required to enable the continued evolution of the site whilst ensuring and ensure that high quality, sustainable and well-designed development is delivered across the campus. It sets out clear expectations for placemaking, design quality, sustainability and coordination, recognising the opportunity to deliver an exemplar development that reflects the strategic significance of the Campus.</p>	<p>This supporting text does not add anything that is not already clearly set out in parts 1-7 of the draft policy and so can be removed.</p>



Note continued

	<p>The policy supports the continued evolution of the site into a world class environment for healthcare and innovation, where collaborative working between institutions, businesses and clinicians can thrive, and where patients, staff, researchers, students, campus residents and visitors can benefit from a functional, inclusive and vibrant setting. It also establishes a positive approach for additional campus worker and patient related housing on the Campus, noting the significant number of employees across the site and the wider housing pressures in the area.</p>	
3.2.22	<p>The Campus has developed in phases, with Phase 2 (south of Dame Mary Archer Way) currently under construction. A third phase, south of the phase 2 land, was allocated through the South Cambridgeshire Local Plan 2018, but planning permission has yet to be granted for development. A Cambridge Biomedical Campus Supplementary Planning Document was prepared to supplement the adopted Local Plan policies, in April 2025, to guide proposals for development coming forward in the short term. However, there remain several challenges that must be addressed as part of future growth. The existing Campus layout, legibility and green space must be improved, and there is limited range of amenities to support the day-to-day needs of visitors. Future masterplans need to address these shortcomings if the site is to deliver a world leading Campus.</p>	
3.2.23	<p>Many of the older buildings on the Campus are now in need of renewal or improvement. The progressive renewal and updating of the NHS buildings on the estate is supported, in order to meet growing</p>	



Note continued

	healthcare requirements, enhance patient care, and create a better environment for patients, staff and visitors in the heart of the campus. This includes not only clinical buildings but also the ancillary infrastructure necessary to support the safe and efficient operation of hospitals and other facilities on the campus.	
3.2.24	The draft Local Plan identifies release of an area of around 22 hectares of land from the Green Belt to meet future needs of the campus and to enable improvement of the existing campus. This land adjoins Babraham Road and is north of a realigned Granham's Road. The realignment of the road will allow improved access into the campus, and development of a comprehensive landscape response to the edge of the city alongside the developments happening at Worts Causeway.	
3.2.25	Given the importance of the Campus <u>to</u> both the local and national economy, and in its role in meeting the health needs of the region, it is considered that there are exceptional circumstances for this Green Belt release. However, development of this land is dependent on demonstration of how it will be part of <u>requires</u> a single coordinated masterplan for the whole site, that it will help deliver the infrastructure the campus needs to serve visitors and staff and that it will enable improvement of the wider campus to deliver a world class hub of innovation and healthcare.	The proposed amendment is more concise and would ensure the terms of allocation are consistent with other parts of the policy.
3.2.26	A key purpose of the policy is to enable a coordinated approach to the <u>completion regeneration</u> of the existing campus and support its further expansion. The approach prioritises integration between new	



Note continued

	development and existing facilities, ensuring that growth is not piecemeal, but strategically planned and delivered. New development must incorporate the operational needs of institutions on site while also enhancing the overall quality, accessibility and functionality on Campus.	
3.2.27	The Campus' location on the edge of Cambridge presents both opportunities and responsibilities. Development must respect the urban-rural transition, ensuring that the Campus integrates positively with surrounding residential areas, the wider countryside, and key environmental assets such as Nine Wells Local Nature Reserve, the Gog Magog Hills and Beechwoods Nature Reserve. The southern part of the allocation includes Green Belt land that will be used to deliver high-quality green infrastructure and biodiversity enhancements, <u>whilst also providing new, improved greenspace for the benefit of all campus users.</u> These measures will improve the setting of the Campus, support ecological networks, and provide new opportunities for recreation and wellbeing, while helping to mitigate the environmental impacts of growth. The enhancement of agricultural, grassland and woodland habitats, the creation of ecological corridors, and the restoration of farmland species are essential components of this strategy.	The proposed amendment is to clarify the use of the land.
3.2.28	Development must deliver a network of inclusive, well-landscaped and connected public spaces, including courtyards, paths and amenity areas that encourage social interaction, support mental and physical wellbeing, and reflect the distinctive character of Cambridge. Particular	



Note continued

	<p>attention will be required at the edges of the Campus, where carefully designed transitions must ensure the built environment integrates sensitively with neighbouring communities and natural features. The setting of Nine Wells will be protected and enhanced through appropriate setbacks, landscape buffers and biodiversity improvements.</p>	
3.2.29	<p>The policy introduces a monitored and enforceable trip budget to ensure that movements are limited and that a genuine shift toward sustainable transport modes is delivered. The future success of the Campus is dependent on improving access for all users while reducing traffic impacts on surrounding roads and communities. Walking, cycling, and public transport will be the primary modes of access, supported by a coherent and legible network of routes within the site. Key movement corridors such as Francis Crick Avenue and Dame Mary Archer Way will be upgraded, while new infrastructure including an east-west 'high street' and mobility hubs will support multi-modal access. Enhanced connectivity with Cambridge South Station and integration of the proposed CSET scheme will help reduce car dependency, and micro-consolidation hubs will support efficient, low-impact logistics for last-mile deliveries.</p>	
3.2.30	<p>Given the complexity of the Campus and the scale of infrastructure required to support growth, development will need to be phased and delivered in a coordinated manner. This must be supported by an Infrastructure Delivery Plan identifying the strategic infrastructure and enhancements required to support the Campus' evolution and how and</p>	<p>The policy is not contingent on identifying a single delivery body, nor should it be interpreted as such.</p>



Note continued

	<p>when they will be delivered. Recognising the importance of implementation, the policy is contingent on the identification and agreement of a delivery body capable of managing the delivery of infrastructure and securing the long-term stewardship of shared facilities and public spaces.</p> <p>Figure 64: Site Plan of Cambridge Biomedical Campus (including Addenbrooke’s Hospital)</p>	
3.2.31	<p><u>Stand-alone</u> applications for small-scale development or those already granted consent will not be required to comply with the full Spatial Framework <u>be considered on their own merits</u> but must still demonstrate consistency with the Campus-wide criteria set out in the policy. Early delivery of key infrastructure, including green space, transport links and utilities, will be critical to avoiding pressure on existing services and ensuring that new development supports the long-term functionality and resilience of the Campus.</p>	<p>As above, proposals may need to come forward on an expedited timeframe. The draft policy should not prejudice this happening, but be flexible enough to accommodate them in an appropriate way that does not prejudice the rest of the masterplan being built out in accordance with its terms. Those proposals may include major development (e.g., a new hospital building or a new headquarters building) and so should not be limited to ‘small scale’ development.</p>
	<u>Biodiversity and Green Spaces</u>	
	<u>Policy BG/BG: Biodiversity and geodiversity</u>	
1.	All development must deliver statutory biodiversity net gain (BNG), providing a minimum of 10% BNG against the baseline, unless exempt	



Note continued

	under the Environment Act 2021, to be provided on-site in line with guidance.	
2.	Major development in Greater Cambridge must provide a minimum 20% biodiversity net gain (BNG), (unless exempt under the Environment Act 2021), to be provided on-site where this is feasible and effective.	
3.	Where onsite options for BNG have been evidenced to be exhausted as agreed with the Local Planning Authority, BNG should be delivered offsite via the purchase of biodiversity credits from a registered strategic habitat bank provider as listed on the Defra Biodiversity Gains Sites Register, or through a bespoke scheme on a site registered on the Defra Biodiversity Gains Sites Register, or through the purchase of statutory biodiversity credits, or a combination of the above. The Local Planning Authority will encourage delivery of replacement habitat within areas identified within the Cambridgeshire and Peterborough Local Nature Recovery Strategy priority areas.	
4.	Planning applications subject to mandatory BNG will require a biodiversity <u>gain</u> plan to be submitted to, and approved in writing by, the LPA prior to commencement of development.	Proposed amendment to align with Government guidance.
5.	Habitat enhancement and creation measures, including their establishment and ongoing management and monitoring, will be prescribed and secured through conservation covenants, planning conditions and / or obligations.	



Note continued

6.	For proposals where development may affect biodiversity (including sites of biodiversity importance, habitats and species of principal importance) or sites of geodiversity, prior to the determination of an application, applicants will provide survey information and site assessment that is proportionate to the likely severity of impacts	
7.	<p>Development proposals which have a direct or indirect adverse effect on sites of biodiversity or geological importance (as identified on the Policies Map) will not be permitted. Exceptions will only be made where the benefits of the development significantly outweigh any adverse impacts. In such cases where development is permitted, proposals must demonstrate that the mitigation hierarchy has been implemented, and the intrinsic natural features of particular interest must be safeguarded and enhanced having regard to:</p> <ul style="list-style-type: none">a. The international, national or local status and designation of the site; and,b. The nature and quality of the site's features, including its rarity value; and,c. The extent of any adverse impacts on the notified features; and,d. The likely effectiveness of any proposed mitigation with respect to the protection of the features of interest; and,e. The need for compensatory measures in order to re-create, on or off the site, features or habitats that would be lost to development.	



Note continued

8.	Development must protect and enhance irreplaceable habitats within Greater Cambridge. Negatively impacting irreplaceable habitat will not be permitted unless wholly exceptional circumstances are demonstrated, and a bespoke compensation strategy is provided.	
9.	Development will mitigate evidenced recreational impacts on designated biodiversity and geodiversity sites, including providing Strategic Alternative Green Space for development proposed within Natural England's Impact Risk Zones for Sites of Special Scientific Interest.	
	<u>Policy BG/GI: Green and blue infrastructure</u>	
1.	All development must demonstrate how it protects and enhances green and blue infrastructure appropriate to the development's scale and location.	
2.	Major residential and commercial development must demonstrate how green and blue infrastructure has been integrated into the design approach at an early stage, to ensure that on-site green and/or blue infrastructure is: a. Multifunctional – individual features in combination contribute to a network of multiple benefits b. Connected – provides or fills a missing natural link in the landscape for the benefit of nature and people	



Note continued

	<ul style="list-style-type: none">c. Sympathetically placed – reflects and/or creates a sense of place, considerate to the context and character of the local environment and priorities of its people and wildlifed. Resilient – responds to the climate emergency in a positive, contributory waye. Responsibly managed – has a sustainable mechanism to support its life-long function and benefitsf. Environmentally sensitive – mitigates its own local impact and improves the quality of the immediate natural environment	
3.	Strategic development will be encouraged to seek accreditation under the Building with Nature Standards.	
4.	All major residential development proposals, or proposals that are predominately residentially led, must meet a minimum Greening Factor of 0.4. All major non- residential development, or proposals that are predominately non-residentially led, should aim to meet a Greening Factor of 0.3. Where the Greening Factor cannot be met on site, then the Local Planning Authority will work with applicants to identify offsite opportunities to enhance local green infrastructure, to be secured by planning conditions and/or obligations and delivered in line with locally identified needs.	



Note continued

5.	<p>The following strategic green infrastructure initiatives are identified priorities for enhancing strategic green infrastructure across Greater Cambridge.</p> <p>Revitalising the chalk stream network</p> <ol style="list-style-type: none">2. River Cam Corridor2a. River Cam Corridor (North East Cambridge to Waterbeach)2b. River Cam Corridor (through Cambridge City)2c. River Cam Corridor (south of Cambridge City)3. Gog Magog Hills and chalkland fringe4. Enhancement of the eastern fens5. The Great Ouse fenland arc6. North Cambridge green space7. West Cambridge Green Infrastructure Buffer – Cotton Corridor8. Western gateway multifunctional Green Infrastructure corridor9. . Pollinator corridors <p>Dispersed initiatives</p> <ol style="list-style-type: none">10. Expanding Greater Cambridgeshire's 'urban forest'11. Woodland expansion and resilience12. Urban greening and 'de-paving'13. Allotments and community gardening	
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Note continued

	14. Environmentally friendly farming	
6.	Major Development located within an area identified for one of the strategic green infrastructure initiatives must demonstrate how the design of on-site green infrastructure has had regard to the relevant initiative's objectives. Major development located elsewhere should provide financial contributions to projects that will deliver on the objectives of one of the green infrastructure strategic initiatives, including relevant for establishment, enhancement and the on-going management costs.	
	<u>Policy BG/TC: Improving tree canopy cover and the tree population</u>	
1.	Major Development proposals must demonstrate, via a Tree Canopy Cover Assessment, how it will achieve a minimum future canopy cover of 30% on site.	
2.	If a scheme can demonstrate significant ecological, historical, landscape or operational reasons to justify a canopy cover of less than 30% on site, an alternative percentage of canopy provision shall be agreed with the Local Planning Authority.	<p>Part (2) of the policy is strongly supported and should be retained to ensure that each site can deliver the most appropriate ecological enhancements for its specific context. Achieving 30% tree cover may not always align with the optimal biodiversity outcomes as there are species that prefer an open habitat.</p> <p>In typical farmland landscapes, particularly those important for farmland birds, such as areas south of CBC, the ecological</p>



Note continued

		priorities are likely to focus on creating diverse grassland habitats, improving and increasing hedgerow networks, and enhancing field margins, rather than maximising tree cover. New tree planting will still be included, but is likely to be restricted to land adjoining existing woodland, and where it is required to deliver habitat connectivity.
3.	All applications for development where there are trees on, or immediately adjacent to, a development site must be accompanied by an Arboricultural Impact Assessment and a tree protection plan and/or a Hedgerow Survey that demonstrates how the proposal: a. preserves, protects and enhances existing trees and hedgerows on site. Retained trees and/or hedgerows should be integrated into the development design to ensure their long-term preservation, and b. ensures that there is sufficient space above and below ground, for existing, replacement and newly planted trees, hedgerows and other vegetation to mature and to be maintained in the long term.	
4.	Where new trees are provided, <u>whether native or non-native species</u> , planting must: a. be of species which are appropriate for the conditions of the site including consideration for climate change, and b. support species diversity and incorporation of long lived trees within the treescape design	Proposed amendment to provide clarification. Non-native species may be more appropriate in specific contexts.



Note continued

5.	Development which includes planting of trees must contribute to long term maintenance via planning conditions and/or obligations as appropriate.	
6.	Development will not be permitted which involves felling, significant surgery (either now or in the foreseeable future), and potential root damage to trees of amenity value, unless otherwise approved by the Local Planning Authority on a case-by-case basis weighing up the impacts of removal against the benefits of development. When felling is approved, appropriate replacement planting will be required to be agreed with the Local Planning Authority.	
7.	<u>Unless approved by the Local Planning Authority, D</u> development proposals should maintain a buffer zone of at least 15 metres from the boundary of any ancient woodland, ancient and veteran trees, ancient hedgerows and any development boundary, to avoid root damage (known as the root protection area). The size and type of buffer zone will vary depending on the scale, type and impact of the development. All proposals should ensure that appropriately wide buffer strips are possible next to tree groups.	Amendment proposed to provide flexibility and clarity, while recognising that this is not preferable.
	<u>Policy BG/EO: Providing and enhancing open spaces</u>	
1.	New development must address the open space needs it generates, which will be secured through a mix of on-site provision and/or financial	



Note continued

	contributions for off-site open space provision, enhancement and/or management.	
2.	<p>The Councils are exploring the potential to require the following standards for major residential development:</p> <ul style="list-style-type: none">a. An Accessible Green Space quantity standard to be confirmed per 1,000 population, to secure provision of parks & recreation space, country parks, natural/semi-natural green space, and informal areas of open space.i. As part of the Accessible Green Space quantity standard, the Councils are exploring the potential to:<ul style="list-style-type: none">1. apply a standard for major development in higher density contexts; and2. secure provision and/or contributions specifically for large scale green spaces including country parks.b. 0.55ha children’s play space and youth space per 1,000 population;c. 0.4ha food growing space per 1,000 population;d. Outdoor sports facilities appropriate to the scale and location of the development, informed by needs identified in the Greater Cambridge Interim Sports Strategy and Greater Cambridge Play Strategy or successor documents.	



Note continued

3.	<p>The Councils will require an Accessible Greenspace standard for commercial development, likely to be applied to development in use classes E(g)(i), E(g)(ii), or E(g)(iii) for 100 employees or more (as calculated using the Councils' latest jobs density calculations). The Councils are continuing to explore the number of hectares per employee to apply within this requirement.</p>	
4.	<p>The scale and types of open space to be provided on site, and the contribution to offsite provision, must be agreed with the Local Planning Authority, having regard to:</p> <ul style="list-style-type: none">a. local area provision and gaps in accessible greenspace when compared against Natural England's Accessible Greenspace Standards – size and proximity standards; andb. site-specific local constraints and opportunities associated with the nature of the proposed development.	
5.	<p>Development proposals must demonstrate how any on-site or off-site open space provided will be of high quality, having regard to the latest best practice guidance for each type of open space provided. The Councils are exploring the benefits of including specific quality standards for certain typologies, including acknowledging the difference between condition and function of open spaces.</p>	