

29 January 2026

Greater Cambridge Shared Planning
Planning Policy Team
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambridge
CB23 6EA

Dear Sir / Madam

Regulation 18 publication of the Draft Greater Cambridge Local Plan 2024-2045 Cambridge Biomedical Campus Ltd Representations

We write to submit representations on the Greater Cambridge Shared Planning Service (GCSPS) Regulation 18 publication of the Draft Greater Cambridge Local Plan 2024-2045 (“the draft Local Plan”). When adopted, the final version of the Local Plan will form the Development Plan for GCSPS and also the basis for decision making.

Cambridge Biomedical Campus Ltd (“CBC Ltd”) was formed in 2021 to act as a non-profit partnership that represents the organisations located on the Cambridge Biomedical Campus. CBC Ltd works with landowners and local government / organisations to drive and inform how the Campus should evolve so that it both maintains and further builds upon its success.

Cambridge as a Strategic UK Life Science Cluster

The UK life science sector has grown significantly in recent years, with Cambridge playing a fundamental role in this. From a national planning policy perspective, the support for investment and the development of the sector is again emphasised by policy E1 in the draft NPPF published for consultation in December 2025.

In October 2024, the government appointed Peter Freeman as the chair to the Cambridge Growth Company (CGC). The CGC is a subsidiary of Homes England, working with local groups to accelerate development opportunities such as the delivery of much needed new homes, a new cancer hospital and significant additional commercial and laboratory space.

On 23 October 2025, the government’s recognition of Cambridge’s potential to supercharge growth in the Oxford-Cambridge corridor was recognised in a speech delivered by Matthew Pennycook, Minister for Housing and Planning, to Parliament which stated:

“The Oxford-Cambridge region is already home to world leading universities and globally renowned science and technology firms. It has the potential to become one of the most

innovative and economically dynamic areas in the world. However, numerous long-standing barriers to further growth, from inadequate transport connections to a lack of affordable housing, are preventing it from realising its true potential”.

The announcement also included a commitment to make up to £400 million of initial funding available for the CGC to support the delivery of its mission, including critical infrastructure and a programme of water-related measures. It also set out the government’s intention to consult on the case for a centrally led Development Corporation as one potential route for delivery.

It is broadly understood that Cambridge is exceptionally well placed in regard to the life science research and development sector, as well as providing leading-edge health care.

Cambridge Biomedical Campus (CBC)

Within the larger Cambridge conurbation, the Cambridge Biomedical Campus provides world leading healthcare research and development, uniquely combining healthcare, academia and leading industry bodies on one site. It is one of Europe’s biggest centres for research and development that seeks to improve patient outcomes.

CBC has added some £4.7 billion to the UK economy via the activities that take place each day on the Campus. Impressively, it is estimated that for every £10 the Campus makes in Cambridge, another £10 is generated elsewhere for the UK economy. The Campus is also the largest employment site in Cambridge, supporting over 22,000 jobs.

The Campus is home to three leading hospitals - Addenbrooke’s, the Rosie maternity hospital and Royal Papworth Hospital. Every year, these hospitals alone treat over 1 million NHS patients. Research and educational organisations present on the Campus also include the Cancer Research UK Cambridge Institute, who are a leading research institute funded by Cancer Research UK, undertaking breakthrough work to improve the outcomes of cancer patients.

The global headquarters for Astra Zeneca is located on the Campus, a biopharmaceutical leader with more than 2,000 scientists working in the highest quality research and development facilities (the Discovery Centre). The Campus is also home to Abcam and other life sciences research and commercial entities, as well as the MRC Laboratory for Molecular Biology—which has produced twelve Nobel Laureates and some of the most influential and commercially important life science breakthroughs globally.

In this context and the Government aspirations for Cambridge, the Campus is well placed to both support and realise this potential.

CBC Ltd Draft Local Plan Representation Approach

CBC Ltd recognises the significant work that the Council have undertaken to reach this point of the plan making process. CBC Ltd welcomes the opportunity to comment on the

draft Local Plan. Overall, CBC Ltd agrees with much that has been included in the draft Local Plan concerning the Campus; indeed it is welcomed that its reputation and high standing is recognised.

CBC Ltd's primary concern for the draft Local Plan is to ensure that the leading international importance of the Campus as a location for life science excellence is protected, enhanced and, importantly, not diluted. For the Campus to retain its leading reputation, it must be vibrant, desirable and offer best in class facilities to attract talent and key life science businesses.

Viewed in this context, our concern is that a piecemeal approach to the development of the Campus pre-empted by the determination of any future applications will result in the fragmentation and weakening of the whole through the under provision of key shared infrastructure, which is vital to its successful function, such as transportation and "place-making" amenities. Our response as CBC Ltd is therefore primarily focussed on adjustments that will strengthen the holistic context in which any future applications on the Campus will be determined. The proposed whole Campus masterplan approach has been drafted recognising that the Campus is not within the ownership of a single entity.

In this representation, CBC Ltd seeks a masterplan led policy approach that will provide clarity concerning the timing / trigger for its production, as well as a properly defined context and framework. The proposed masterplan policy approach is intended to provide clear guidance to inform and shape development on the Campus and ultimately ensure that future development continues to contribute to the success of the Campus. It is proposed that the masterplan policy should preface the site allocation text so that the aspirations for the site are read in this context.

This policy approach also proposes clear triggers and parameters for the types of development proposals which would require a whole Campus masterplan; these include:

1. Prior to any major application being approved within land which forms part of Phase 3 (which was allocated by E/2 in the Adopted South Cambridgeshire Local Plan);
2. Prior to any major application being approved within land which forms part of Phase 4, as identified in Figure 65 as land proposed for green belt release.

The requirement for a masterplan is not triggered by development on the existing Campus that does not constitute major development or is an amendment to an extant permission.

For any development or works shown on the adjacent land identified as within the Strategic Enhancement Area and Landscape Improvement Area, it is proposed that the Local Planning Authority will review the need for a whole Campus masterplan in the context of the works proposed.

It is also proposed that works to provide the Strategic Enhancement Area will come forward ahead of any on the land identified within the Landscape Improvement Area. This is on the

basis that given the proximity of the Strategic Enhancement Area to the Campus it offers significant opportunity for place shaping and access to outdoor space while the area within the Landscape Improvement Area sits further afield.

The need for an Infrastructure Delivery Plan (IDP) is also linked to the proposed Campus masterplan triggers.

We set out below our comments on the draft Regulation 18 policies and have made suggestions for changes to policy wording and supporting text. This is both where points of clarification are proposed and where it is considered that amendments are required to provide further direction in regard to a strategic approach. This is designed to ensure that the Campus's function as a leading centre is retained, protected and enhanced in the future.

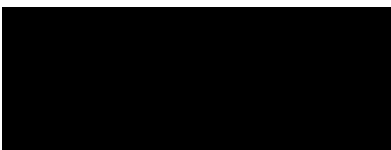
At Appendix 1 we enclose tracked change versions of the relevant policy wording and supporting text, which show the suggested changes. These changes should be read alongside the justifications noted.

Concluding Remarks

We trust that the information provided will be considered as part of the consultation process on the draft Local Plan and look forward to receiving confirmation that this representation has been received.

CBC Ltd wishes to contribute towards future stages of the GCSPS Draft Local Plan process and therefore would be grateful if the Council could advise of further opportunities for participation and the submission of representations.

Yours faithfully



Laurel Powers-Freeling
Chair, Cambridge Biomedical Campus Ltd

Appendix 1: Schedule of Suggested Policy and Supporting Text Amendments / Clarifications

Overview

1. This appendix sets out Cambridge Biomedical Campus Ltd proposed amendments to the draft Policy wording as included within the draft Local Plan.
2. Changes are in *blue italics* (which primarily relate to the inclusion of a new masterplan led approach) and should be read in conjunction with the proposed justification and above supporting letter. Please note that we have only included the sections of the draft Policy text and supporting text where we are proposing changes.
3. The following draft policies and supporting text are covered within this document:

Draft Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)

Policy paragraph number	Proposed justification / notes
<p><i>Paragraph 3.2.18 - The Cambridge Biomedical Campus is considered a strategic national asset and is of national international importance. This policy will guide development within the existing campus and also identifies land to be released from the Green Belt for a future phase. It establishes requirements for a new masterplan and the triggers for this 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 health services as well as compete internationally as a centre of research.</i></p>	<p>It is proposed that paragraph 3.2.18 should be amended to reflect the national and international significance of the Campus, as is noted later in the draft site allocation. Amendments are also proposed such that it reflects the proposed masterplan approach and makes clear that this is based on a development threshold approach.</p>
<p><i>New heading and new para 8</i></p> <p>Cambridge Biomedical Campus Masterplan</p> <p><i>To protect and enhance the Cambridge Biomedical Campus as a nationally important asset and an internationally significant center for healthcare research and excellence, any future development on Phase 3 or 4 of the Campus must be planned and delivered as part of a comprehensive and coordinated approach to the campus as a whole. In order to secure this, a whole Campus masterplan will be required:</i></p> <p><i>1. Prior to any major application being approved within land which forms part of Phase 3 (which</i></p>	<p>The proposed masterplan policy provides the opportunity to capture wider place making and strategic infrastructure required on the Campus early on and so that any new major applications on Phase 3 or 4 of the Campus are considered in this context and not in isolation to just these parcels of land.</p> <p>The intention is to build upon the approach set out in current para 27 of the draft Local Plan so that it sits at the front of the site policy and requires an approved Campus wide masterplan before any major application is approved on land within Phase 3 or 4 of the Campus. Importantly, it also requires the masterplan to be kept up to date so that any future applications are considered in any revised context.</p>

<p><i>was allocated by E/2 in the Adopted South Cambridgeshire Local Plan);</i></p> <p><i>2. Prior to any major application being approved within land which forms part of Phase 4, as identified in Figure 65 as land proposed for green belt release.</i></p> <p><i>In respect of any works shown on the land identified as within the Strategic Enhancement Area and Landscape Improvement Area, the Local Planning Authority will review the need for a whole campus masterplan in the context of the works proposed. It is required that the land identified within the Strategic Enhancement Area will come forward with enhancement works before the Landscape Improvement Area given its proximity to the Campus and opportunities for place shaping and access to outdoor amenity space.</i></p> <p><i>The requirement for a masterplan is not triggered by development on the existing Campus, development that does not constitute major development or is an amendment to an extant permission on the existing Campus.</i></p> <p><i>The whole campus masterplan will be expected to:</i></p> <ul style="list-style-type: none"> <i>A. Include a comprehensive campus-wide masterplan which addresses key requirements such as access and movement, land uses, green and blue infrastructure, scale and massing and densities;</i> <i>B. Set out the layout, mix and scale of uses, including the relationship with the existing Campus composition in terms of its layout and uses;</i> <i>C. 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;</i> <i>D. Set out the proposed phasing for development across the Campus:</i> 	<p>The proposed wording is included to highlight that given the proximity of the Strategic Enhancement Area to the Campus and significant opportunity for place shaping and contribution to the Campus it offers, works on this land should take place before any works on the land within the Landscape Improvement Area take place. The land identified within the Strategic Enhancement Area sits directly adjacent to the Campus and the composition and function of this area should be agreed so that any works to the Landscape Improvement Area, which sits adjacent to the phase 4 extension area and further afield from the Campus, are designed to assimilate into this.</p>
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- E. Include 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;*
- F. Include 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 enhancement set out in the Spatial Framework, 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;*
- G. Provide clear and enforceable strategies for delivery, management and stewardship of shared facilities and public realm;*
- H. Detail 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;*
- I. 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.*
- J. Establish design parameters for building heights, materials, landscaping and wayfinding throughout the Campus;*
- K. Set out what infrastructure is needed, including appropriate triggers regarding the quantum of development and how the necessary infrastructure to support the successful function of the Campus will be delivered;*
- L. Include clear and enforceable strategies for delivery, management and stewardship of shared facilities and public realm;*
- M. Provide a detailed transport assessment including the delivery of sustainable transport*

<p><i>and active travel onto and across the Campus;</i></p> <p><i>N. Identify how the phases 3 and 4 will integrate with the existing Campus and life science function;</i></p> <p><i>O. Include a comprehensive amenity strategy ;</i></p> <p><i>P. Detail how the Masterplan will satisfy the policies of the Local Plan; and</i></p> <p><i>Q. Demonstrate how the whole Campus masterplan will protect and enhance the natural environment and ecological networks by achieving net gains in biodiversity.</i></p> <p><i>The Campus masterplan should be kept up to date and therefore ahead of any further major applications being approved on the campus, the masterplan should be updated to reflect any previously approved major applications.</i></p>	
<p><i>Para 8 part d - Capacity for approximately 1,000 additional homes on the campus, while not limited to, this should primarily serve Cambridge University Hospital / NHS campus workers including medical students.</i></p>	<p>So as to support the key research and development / patient care of the Campus, it is proposed that any housing delivered on the Campus should primarily serve Cambridge University Hospital / NHS campus workers including medical students. This is set out at para 11 of the draft Local Plan, but should be reinforced throughout the site policy.</p>
<p><i>Para 10 – Given the range of existing and proposed uses and the 24 hour nature of the Campus, a comprehensive 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 to achieve this, and all major proposals which include these uses will need to provide an amenity strategy that details how the proposals will:</i></p> <p><i>a. Support the needs of the campus users throughout the day and night;</i></p> <p><i>b. 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;</i></p>	<p>The proposed amendment is sought to make clear that any application on the Campus which includes hotels, conference centres, nurseries, sports, leisure, food and beverage, convenience retail, community gardens and food-growing uses will need to provide an amenity strategy.</p>

<p>c. Ensure they do not compromise the operational needs of the Campus;</p> <p>d. Enhance the vibrancy of the Campus and the visitor, patient and employee experience.</p>	
<p><i>Para 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 and, in appropriate locations, open space. It is required that the land identified within the Strategic Enhancement Area will come forward with enhancement works before the Landscape Improvement Area given its proximity to the Campus and opportunities for place shaping and access to outdoor amenity space.</i></p>	<p>The amended wording reflects the proposed approach in relation to the sequence of works taking place on the Strategic Enhancement Area and Landscape Improvement Area.</p>
<p><i>Para 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. It is required that the land identified within the Strategic Enhancement Area will come forward with enhancement works before the landscape improvement area. The design of such spaces must ensure:</i></p> <p><i>a. delivery of biodiversity enhancements, while accommodating appropriate amenity, recreation, and wellbeing functions;</i></p> <p><i>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;</i></p> <p><i>c. existing agricultural, grassland and woodland habitats are enhanced, improving ecological links between Nine Wells LNR and Gog Magog Hills;</i></p> <p><i>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.</i></p>	<p>The amended wording reflects the proposed approach in relation to the sequence of works taking place on the Strategic Enhancement Area and Landscape Improvement Area.</p>

<p><i>Para 18 - Proposals in the Landscape Improvement Area, which are expected to come forward following works in the Strategic Enhancement Area, must:</i></p> <ul style="list-style-type: none"> <i>a. Create and/or enhance existing ecological corridors between the nature reserves of Nine Wells and Beechwoods;</i> <i>b. Establish high quality active travel routes from Limekiln Road into the southern end of the Campus;</i> <i>c. Incorporate natural drainage features which specifically addresses surface water flood risk associated with the expansion land north of Granham's Road.</i> 	<p>The amended wording reflects the proposed approach in relation to the sequence of works taking place on the Strategic Enhancement Area and Landscape Improvement Area.</p>
<p><i>New para 20 – Securing Public Space</i></p> <p><i>As part of major proposals on the Campus, an appropriate and proportionate sum via Section 106 Agreement should be sought to support place making in the Campus in the context of the development works proposed.</i></p>	<p>It is welcomed that the importance of public spaces and place shaping is recognised under the public space section.</p> <p>In order to ensure that major development proposals contribute to this, a new paragraph is proposed that would secure appropriate and proportionate monies via Section 106 Agreement to support and further this on Campus.</p>
<p><i>Para 22 - To support delivery of the agreed campus-wide masterplan, a strategic and local transport mitigation plan must be prepared by the developer in consultation with the Local Highways Authority and Local Planning Authority. This must include:</i></p> <ul style="list-style-type: none"> <i>a. Sustainable transport measures;</i> <i>b. Indicative costings;</i> <i>c. Phasing; and</i> <i>d. Potential delivery via a Section 106 agreement or CIL.</i> <p><i>The requirement for a strategic and local transport mitigation plan is not triggered by development on the existing Campus, that does not constitute major development or is an amendment to an extant permission on the existing Campus. A strategic and local transport mitigation plan will be required:</i></p> <ul style="list-style-type: none"> <i>1. Prior to any major application being approved within land which forms part of Phase 3 (which was allocated by E/2 in the Adopted South Cambridgeshire Local Plan);</i> <i>2. Prior to any major application being approved within land which forms part of Phase 4, as</i> 	<p>The proposed amendments are sought to link the need for a strategic and local transport mitigation plan trigger point so that it is in line with the proposed trigger requirement for a whole campus masterplan.</p>

<p><i>identified in Figure 65 as land proposed for green belt release.</i></p> <p><i>Any development or works shown on land identified as within the Strategic Enhancement Area and Landscape Improvement Area, the Local Planning Authority should review the need for a strategic and local transport mitigation plan in the context of the works proposed.</i></p>	
<p><i>Para 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 in line with the Cambridge Biomedical Campus Masterplan policy requirement.</i></p>	<p>The proposed amendment seeks to reinforce the proposed masterplan policy approach throughout the site allocation.</p>
<p>Para 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> <ul style="list-style-type: none"> a. A comprehensive campus-wide masterplan which addresses key requirements, such as access and movement, land uses, green and blue infrastructure, scale and massing and densities; 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; c. Full phasing plans, including any further planned development or redevelopment in early phases of the Campus; 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; e. An Infrastructure Delivery Strategy, identifying required site-specific and strategic infrastructure 	<p>It is proposed to delete this paragraph as the proposed masterplan policy as a new paragraph 8 includes the matters noted as well as others to secure long term sustainable development on the Campus.</p>

<p>requirements to help achieve the vision for the Campus as well as wider Campus enhancement set out in the Spatial Framework, 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>f. Clear and enforceable strategies for delivery, management and stewardship of shared facilities and public realm;</p> <p>g. 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> <p>h. 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>	
<p><i>Para 28 – Applications for full planning permission and/or reserved matters applications must be supported by In line with the masterplan policy for the Campus, Major applications on phase 3 and phase 4 land must be supported by 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.</i></p>	<p>The proposed wording seeks to bring the need for phasing plans in line with the proposed masterplan policy for the site allocation.</p>
<p>Supporting Text</p>	<p>Proposed justification / notes</p>
<p><i>Para 3.2.30-</i> 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. Relevant development as identified in the masterplan policy This must be supported by an Infrastructure Delivery Plan identifying the strategic infrastructure and enhancements required to support the Campus' evolution and how and when they will be delivered.</p>	<p>The proposed amendments seek to reflect the proposed approach in regard to a masterplan led approach which would also include an Infrastructure Delivery Plan.</p> <p>Furthermore, the policy should not be contingent on the identification of a delivery body and amended wording is proposed.</p>

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 *is essential*.