Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	David Plank	
Organisation (where relevant)	Trumpington Residents' Association FORM THREE of four	
Job Title (where relevant)	Management Committee member	
Address, including Post Code	[redacted]	
Telephone		
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy S/CBC Cambridge Biomedical Campus (including Addenbrooke's Hospital) Areas of Major Change in the Cambridge Urban Area – 3.2 Edge of Cambridge
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	Yes / No
Legally compliant	As far as we know
Sound	NO

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

NOTE: Text shown in bold italics is a conclusion, proposal or recommendation

Cambridge Biomedical Campus – Policy S/CBC

Does the Local Plan Submission justify the "exceptional circumstances" required by national policy[1] for the CBC's further expansion into the Greater Cambridge Green Belt?

<u>What is the CBC's purpose, what makes it "unique"?: the uses that should be located on the CBC and those that should not</u>

Our opposition to date to the CBC's yet further expansion into our Green Belt does not result from purblind attachment to preservation of the Green Belt no matter what. It was the result of a rational and concerned view that neither the CBC in its submissions nor the two councils in the Draft Local Plan had established the "exceptional circumstances" which are the only grounds for further release – for the only incursion into the Cambridge edge of the Green Belt proposed in the Plan. To date the *prime reason* for this has been the continued failure of the CBC to define what uses were and were not acceptable in pursuit of its "unique" purpose.

*Therefore, we are **delighted** to see that the amendment we proposed to the CBC's purpose as stated in the Draft Local Plan's version of Policy S/CBC has been accepted in its entirety by the two councils in the proposed Local Plan Submission, viz.:*

> "The Cambridge Biomedical Campus… , is appropriate for a mix of uses centred on the Campus' unique function of bringing together clinical care, clinical education and clinical research including medical research institutes and life sciences which meet local, regional or national health care needs – together with

[1] National Planning Policy Framework. Ministry of Housing, Communities and Local Government. August 2026. This sets out "sets out the government's policies for plan-making and for making decisions on development proposals in England and how these are expected to be applied." https://www.gov.uk/guidance/national-planning-policy-frameworkhttps://www.gov.uk/guidance/national-planning-policy-framework

directly related biomedical and biotechnology research and development activities." [Page 217]

This amended statement of the CBC's purpose fully recognizes that the "unique function" of the CBC is the "tripartite mission" of clinical care, clinical education, and clinical research pursued historically by university hospitals and medical schools whose combined endeavour is sometimes called an Academic Health Science Centre (AHSC). In Cambridge, various aspects of co-location have been critical to the growth and pre-eminence of the AHSC. These include: 1) the location of academic departments within the 1960's hospital building; 2) the location of clinical school research units adjacent to the hospital; and 3) the location of the office of the Regius Professor of Physic (head of the clinical school) with the hospital management offices on 'the bridge'.

A different form of 'proximity' that has also been critical to AHSC success is overlapping medical staffing arrangements. University staff work in the NHS on honorary contracts and provide both intellectual leavening and leadership. They use their dual role in research and clinical care to inform and advance their work and reputations. Some NHS staff are also engaged in research and this often involves collaboration with colleagues in the University. Contrary to what might be assumed, University staff undertake little teaching of medical students, this role being undertaken by NHS colleagues. These arrangements are accompanied by complex funding flows for medical staffing between the NHS and the University. The location of the MRC Laboratory of Molecular Biology (LMB) on the main drive, since relocated to its spectacular fit for purpose premises, has been another historic driver of the tripartite mission. The arrival of GSK in the 1990s with a clinical research facility linked to the main hospital corridor began to add *directly related* commercial R&D to the picture.

*This was the winning organizational configuration advocated in CBC Vision 2020 which made the CBC **"unique"***, and was being constrained by the hospital being too small to meet the demands of a growing population and an increasingly successful academic partner wanting to do ever more clinical research. ["2020 Vision at Addenbrooke's: The future of the hospital campus – update July 2004"]

*That this winning configuration has now at last been recognized and accepted in the proposed Local Plan Submission is cause for celebration. **But is it enough on its own** to conclude that "exceptional circumstances" have been established sufficiently to justify expansion of the CBC into the Green Belt as the Local Plan Submission proposes?* On its own - **No, it is not**

At this point it is important to remember the two councils' crucial general conclusion in the proposed Local Plan:

> *"… the councils have concluded that Greater Cambridge's development needs **do not justify** the exceptional circumstances required to release land from the Green Belt."*
> [Development Topic Strategy Paper, paragraph 8.9, page 222] [Our emphasis]

*The change in the statement of the CBC's purpose important though it is, is not enough without substantial supporting evidence of "exceptional circumstances" to justify the CBC being the only exception to this general conclusion. **But as we show in the next section, that evidence is not provided in the proposed Local Plan Submission**.*

Are other convincing arguments advanced in the proposed Local Plan Submission which establish "exceptional circumstances" justifying the CBC's further expansion into the Green Belt?
No, they are not.

This is because the Local Plan Submission merely asserts that there are exceptional circumstances sufficient to justify removal of a further 22 hectares of land from the Greater Cambridge Green Belt. It does not provide substantial evidence in support of that conclusion.

Where in proposed Policy S/CBC or in the supporting documentation including the Site Allocations Topic Paper is there a convincing justification beyond the assertions that the CBC is "unique" and of "global significance"? Please refer to Policy S/CBC, paragraphs 2 and 3, page 217; and to Site Allocations Topic Paper, pages 109 – 111, which contain a convenient rather than convincing analysis - *in which the two councils have also misled themselves on a crucial point*. (See "Level of Harm to the Green Belt: Misleading Assessment" - page 13 below).

The CBC's supporting documents "Demand and Deliverability" and "The power of proximity" on which the two councils appear to rely, *do not provide this evidence* as they are rooted in the previous open-ended non-definition of the uses that are / are not acceptable on the CBC. Surprisingly, that evidence has not been revised to reflect the fundamental shift that has occurred as a result of the clinically based statement of purpose now adopted. [See above "What is the CBC's purpose, what makes it "unique"?"] *That evidence submitted by the CBC is no longer directly relevant. Witness the high estimates of demand featured in the CBC's submissions* – particularly Knight Frank's "Demand and Deliverability" report. ***If the statement of the CBC's purpose now proposed in the Local Plan Submission had been used, the estimates of demand would have been significantly lower. This is the key reason why "exceptional circumstances" have <u>not</u> been established for removing yet another 22 hectares from the Greater Cambridge Green Belt for the CBC*** – on top of the 77 hectares already removed (68 of which the TRA supported to nurture the CBC's unique purpose)***.***

A telling paragraph in the CBC's "Demand and Deliverability" submission reads:

> *"Within the last 5 years the CBC has attracted 765,000 sq. ft of demand, 153,000 per annum on average, which is approximately 33% of the annual average take up across the City. 100% of the space taken up on the CBC is commercial research/laboratory accommodation."* [Knight Frank. Section 7.1, page 7/40]

Really? 33%? 100%? These percentages vividly illustrate the open ended nature of the previous non-definition of the CBC's central/unique purpose. ***Because they are not based in a definition in which the CBC's clinical heart is pivotal, the CBC's / Knight Frank's demand estimates are not a reliable basis for further physical expansion. Revised estimates are required rooted in the CBC's clinically based statement of purpose. Until they are produced and rigorously assessed it must not be concluded that exceptional circumstances exist to justify yet further expansion at very high / high harm to our diminishing Green Belt.***

A careful reading of the Site Allocations Topic Paper leads us to the conclusion that the *prime argument* in support of the Local Plan Submission's proposal for expansion of the CBC as the only exception to its general conclusion "that Greater Cambridge's development needs do not justify the exceptional circumstances required to release land from the Green Belt"[2], is this statement:

> "The expansion provides the opportunity to provide new facilities to enhance the site, *but also support the enhancement of the existing campus*." (Our emphasis) [Site Allocations Topic Paper 2025 (not amended by the 2026 update in the Submission documents), paragraph 3.103, page 110]

This is true no doubt. *But are we to believe* that it is only with the additional 22 hectares that long planned improvements such as the "…new east-west "high street" can be provided? [Local Plan Submission, page 223] Surely not – the main obstacle evidently being that the capital funding has not been made available by the government to re-provide Addenbrooke's Hospital, the current configuration of which presents the substantial physical obstacle to the road's construction.

And then there is the as yet undeveloped *Phase 3* former Green Belt land (8.94 ha) which was removed from the Green Belt at last knockings in the adoption of the current Local Plan despite our and others' strong opposition. The sufficiency or otherwise of this to meet the newly defined Local Plan CBC statement of purpose is not addressed explicitly in the Local Plan Submission. ***Why not given its direct relevance? It should be - and we ask that it is.***

Level of Harm to the Green Belt: Misleading Assessment

There is a further substantial reason why exceptional circumstances are not justified in the proposed Submission: the Greater Cambridge Shared Planning Service (GCSP) and the two councils have misled themselves on the level of harm to the Green Belt were development to be allowed up to a realigned Granham's Road as proposed.

Why do we say this?

The Local Plan Submission's "Site Allocations Topic Paper" in relation to the CBC argues:

> "3.105 In exploring the potential for the site allocation, the potential benefits of realigning Granhams Road have been considered, which would increase the area of the Green Belt release. This includes reviewing evidence submitted by the site promoters. It is considered that the realignment has the potential to improve the junction layout, prov(id)ing improved connectivity to the (Babraham) park and ride and road access.
>
> 3.106 The revised site boundary (produced by the proposed realignment of Granham's Road) would require land that forms part of a land parcel that the Green Belt Study identified as 'very high' harm, beyond the First proposals site which was classified as 'high' harm. The Councils commissioned (from Quod) a supplement to the Cambridge Green Belt Study (2021) to consider the impact of this change. *The alternative scenario assessments for parcels RC10 and RC11 suggest that the realigned course of Granham's Road would mark the distinction between land in RC11 that would cause 'high' harm if released from the Green*

[2] Development Topic Strategy Paper, paragraph 8.9, page 222

Belt, and land in RC10 that would cause 'very high' harm. These are the same ratings that were assigned to RC10 and RC11 in the original assessment. *Therefore, despite being located further into the open countryside, the realigned Granham's Road would still mark the transition from 'high' to 'very high' harm*." [Page 108] [Our emphasis]

This is not accurate. It is not true.

LUC (Land Use Consultants) is the organization commissioned by the Greater Cambridge Shared Planning Service to assess the Greater Cambridge Green Belt in the context of the emerging Draft Local Plan. They produced the "Cambridge Green Belt Study 2021" endorsed by the GCSP and the two councils. This remains a foundation of the Local Plan Submission. LUC is, therefore, an authoritative source. In "Greater Cambridge Green Belt Assessment Response to CBC submission on justification for realigning Granham's Road", October 2024, commissioned and endorsed by South Cambridgeshire District Council and Cambridge City Council, LUC comments on Quod's (on behalf of CBC) assessment reproduced above as follows:

> "2.4 LUC agrees that the triangle of land would be weakened in Green Belt terms (see paragraph below), but it does not follow that strengthening the new Green Belt edge to compensate for this is a benefit of realigning the road. If the cause of the weakening of the Green Belt is the realignment of the road, then the realignment of the road should not be seen as a benefit that will offset this harm. Instead, the weakening of the GB that would result from road realignment needs to be considered as an adverse impact, to be set against any potential benefits in terms of highways movement and additional campus development…
> 2.15 RGR's (Realignment of Granham's Road's) conclusion is that a 'relatively limited' contribution to Purpose 1 and a 'moderate' contribution to Purpose 2 and to Purpose 3, combined with a 'minor-moderate' additional impact on adjacent GB land, equates to 'low' harm'."
> 2.16 ***This conclusion is a misapplication of the methodology.*** In terms of the constituent elements the only one we differ on is that contribution to Purpose 1 should be 'moderate' rather than 'relatively low', *and even with those ratings* ***the level of harm has been significantly understated****."* (by Quod)… [Our emphasis]
> 2.19 The picture would be different if the assessment was of the additional harm of releasing RC11b as well as RC11a, instead of just releasing RC11a. In this respect, as we have given a 'high' harm rating to both, it could be suggested that there is no additional harm. *However, this would be a misinterpretation of what the harm ratings are providing, as harm to the Green Belt is a product not just of harm ratings but of the extent of land released.* Clearly the release of a larger area is affecting the Green Belt more than release of a smaller area, but in this case that additional release would not constitute a step-change in terms of impact on the Cambridge Green Belt purposes.
> 2.21 The arguments regarding a stronger City edge and planning positively in order to reduce the risk of later unplanned development could be challenged – noting that a strengthening of the Green Belt and GI are already requirements for any release of additional land for CBC development under First Proposals Policy S/CBC. Rounding off the urban edge so that it aligns across Babraham Road would leave a stronger distinction between the new urban edge and the Green Belt in the RC11b area but, as demonstrated in the analysis above, RC11b is not 'weak' Green Belt. *It is hard to argue that removing land from the Green Belt, rather than strengthening the boundary along the current alignment of Granham's*

Road, would in any way strengthen the Cambridge Green Belt. The proposed realignment would create a slightly more direct link to the proposed new southern entrance to CBC, and therefore a shorter Green Belt edge, but the current Green Belt edge could be strengthened similarly albeit perhaps at the expense of some development floorspace." [Our emphasis]

2.23 ***To conclude, in weighing up the arguments we would suggest that the harm to the Green Belt purposes that <u>should</u> be taken into account is the 'very high' harm associated with the current contribution of land in RC11b***, but that the factors weighing against this harm should be i) the need for additional floorspace, but also ii) any highways/traffic benefits of road realignment and iii) the lack of significant additional impact on adjacent Green Belt land that would result from development of land in RC11b and creation of a new boundary along a realigned Granham's Road." (Our emphasis)

[Land Use Consultants, "Greater Cambridge Green Belt Assessment Response to CBC submission on justification for realigning Granham's Road", October 2024, commissioned and endorsed by South Cambridgeshire District Council and Cambridge City Council]

Therefore, LUC's commissioned and councils' endorsed assessment shows the opposite of what the two councils claim in the Site Allocations Topic Paper and rely on in their subsequent judgement. Instead of being based as it currently is in *the inaccurate assessment* by the GCSP / two councils that "… *despite being located further into the open countryside, the realigned Granham's Road would still mark the transition from 'high' to 'very high' harm*", as the two councils claim, [paragraph 3.106] ***the Local Plan Submission should be based on the accurate conclusion that the harm to the Green Belt purposes that should be taken into account is the 'very high' harm*** *associated with the current contribution of land in RC11b".*[Paragraph 2.23] [Our emphasis]

We believe that on this crucial point in the Local Plan Submission, GCSP and the two councils have misled themselves, and should reassess their position on the basis of LUC's accurate assessment which they commissioned and have endorsed, that development up to a realigned Granham's Road would cause Very High Harm to the Green Belt not High Harm as they have assumed. We ask them to do so – as we did in our response to the Draft Local Plan, a request that appears to have fallen on deaf ears.

Until they do this, they should NOT regard their case for exceptional circumstances for release of Green Belt land to have been established. To establish or otherwise those circumstances, the two councils must also carefully assess and respond to the argument we advance above that the CBC's estimates of demand for space on the CBC are significantly over-stated being based in a distortion of the CBC's unique purpose now identified correctly in the Local Plan Submission. *As we did in our response to the Draft Local Plan,* ***we ask GCSP and the two councils to thoroughly reassess this crucial matter and to publish / issue that reassessment for full public consultation before making a decision prior to the Local Plan Submission public inquiry.***

*If the two councils do not agree to our reasonable request in their Local Plan Submission****, we ask the Planning Inspector and the Secretary of State to reassess the proposal to release 22ha of Green Belt land up to a realigned Granham's Road***

in light of the fact that it would cause Very High Harm not High Harm to the Greater Cambridge Green Belt.

Let us be clear. An accurate reading of the Draft Local Plan evidence shows that the 19 hectare expansion of the CBC up to the current alignment of Granham's Road tentatively proposed in the "First Proposals" would be at a cost of ***High Harm*** to the Green Belt. Whereas the 22 hectares expansion of the CBC up to a realigned Granham's Road proposed in the Draft Local Plan and now the Local Plan Submission would be at the cost of ***Very High Harm*** to the Green Belt.

For the reasons we have given, we do not believe that either the 19 or the 22 hectare expansions into the Green Belt yet meet the "exceptional circumstances" test for removing land from the Green Belt. **However, *our objection to the 22 hectare removal is considerably greater than the 19 hectare removal because the 22 hectare removal would cause Very High Harm to the Green Belt. The claimed transport / traffic benefits of realigning Granham's Road*** - though not insubstantial in terms of "rationalising junction arrangements" and improving "integration between CBC and Babraham Park and Ride" - ***in no way justify causing Very High Harm to the Green Belt.*** [Quod. Realignment of Granham's Road. Page 7]

POSITIVE PROVISIONS

Notwithstanding its failure to establish the exceptional circumstances required to justify the further expansion of the CBC into the Green Belt, proposed *Policy S/CBC also includes many positive features which we welcome and strongly support*. A selection is listed below to indicate what we mean – and demonstrate that the TRA takes a very positive view towards the improvement of the Campus despite the great pressures / demands its growth makes on Trumpington and our close neighbours.

A selection of Positives from Policy S/CBC which we strongly support is listed below:

- "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. Given the scale and long term construction of the Campus, a site wide Place Book shall be prepared to establish the vision, place-making objectives and quality expectations for the Campus and provide the foundation for the site wide Masterplan and Design Codes. The Design Code will ensure that each phase of development positively contributes towards the high-quality placemaking outcomes expected." [Proposed Local Plan Submission, page 217, paragraph 7]
- "Development proposals must make a positive and meaningful contribution to it becoming a world leading healthcare, life-science and educational cluster. In order to achieve this, a whole Campus Masterplan developed with input from existing landowners across the Campus, will be required prior to any major application being approved within land which forms part of Phase 3 or Phase 4…"[Page 218, paragraph 10] [NOTE: We would add Phase 2 to this as well given Phase 2 applications are still being made.]

- "To support the housing needs of those working on the Campus, the redevelopment and intensification of plots within the existing Campus for residential uses will be supported where they: a. Primarily serve CUH/NHS campus workers including medical students. Short term accommodation for patients and/or their families, housing for employees of an institution or corporation that is resident within the Campus, including visiting, temporary workers and technical staff working with organisations on the Campus or life science organisations in the immediate southern cluster, may be acceptable where this is not prioritised or over provided relative to CUH/NHS accommodation; … e. Does not compromise healthcare operations or clinical safety." [Page 218, paragraph 11]
- "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. To achieve this, development (should) optimise the use of the developable land within the Campus boundary and must align with the indicative Spatial Framework for the Campus and/or agreed masterplan and must also:…" [Page 219, paragraph 14]
- "… and must also: a. Integrate sensitively with adjoining residential neighbourhoods, the wider Green Belt, and countryside to the south, ensuring appropriate transitions in height (responding to Policy GP/ST), scale, and landscaping without undermining the optimisation and function of the land within the Campus; b. Retain and where possible enhance key strategic and local views, especially the Magog Down and wider countryside approaches and local landscape features including Nine Wells Local Nature Reserve;" [Page 219, paragraph 14]
- "Proposals in the Strategic Enhancement Area (S/SEA/CBC) must: a. Provide a well-vegetated landscape buffer 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;…" [Page 221, paragraph 18]
- "Proposals in the Landscape Improvement Area (LIA) must: a. Create and/or enhance existing ecological networks, including between the nature reserves of Nine Wells and Beechwoods; b. Establish high-quality active travel routes from..." [Page 221, paragraph 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, visitors and local residents, and facilities to support accelerated patient recovery, and to maximise delivery of complementary biodiversity enhancements. This will be achieved by provision of:… [Page 221, paragraph 20]
- "Carefully landscaped campus edges to create a green transition from the city to the surrounding countryside, integrating the Campus with its surroundings, helping to reduce the visual and operational impact, and supporting the setting of Nine Wells and the Green Belt." [Page 222, paragraph 20.f.] [NOTE: As distinct from the inappropriately assertive Campus gateway advocated by the CBC's Landowners which we reject – See TRA Response to the Draft Local Plan, page 16, last two paragraphs]

- "As part of major proposals on the Campus, an appropriate and proportionate contribution via Section 106 Agreement should be sought to support placemaking in the Campus in the context of the development works proposed." [Page 222, paragraph 21]
- "To support delivery of the agreed whole Campus masterplan, a strategic and local transport mitigation plan must be prepared by the developers for agreement with the Local Highways Authority and Local Planning Authority. This must include:.." d. Infrastructure costing and delivery phasing, demonstrating how the necessary transport measures identified above will be delivered at a time that enables optimal transport outcomes and remains within the agreed trip budget; and e. Mechanisms for delivery, monitoring and review including potential delivery through Section 106 obligations, or CIL or other appropriate funding mechanisms." [Page 224, paragraph 24]
- "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. [Page 225, paragraph 29]
- " 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 a comprehensive masterplan, for approval as part of future outline planning applications including Phase 3 and 4. Landowners must engage with other stakeholders and the Local Planning Authority in order to achieve the overall comprehensive Masterplan for the Campus. [Page 225, paragraph 30]
- "A comprehensive Campus-wide masterplan will be expected to:…h. Set out 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; [Page 225, paragraph 31] [NOTE: We have long argued for this, and are very pleased to see it given prominence as a mandatory requirement distinct from the Local Plan process which the Landowners have attempted in the past to substitute inappropriately for their own essential process.]
- "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 when they will be delivered. Recognising the importance of implementation, the policy is contingent on the identification and management of the delivery of infrastructure and including securing the long-term stewardship of shared facilities and public spaces. Implementation may be delivered through agreement of a delivery body capable of managing infrastructure delivery."[Page 231, paragraph 3.2.41]

Rightly, the requirements on the CBC of Policy S/CBC are considerable. In our view, ***this requires a step-change in the effectiveness of the CBC's collective endeavour*** with which it has had difficulty to date. Key organizations on the CBC will need to work together more corporately to achieve this.

Proposed realignment of Granham's Road: A Fatal Flaw

Whatever its merits, there is ***a fatal flaw*** in the CBC Landowners' proposal to realign Granham's Road – and hence in the proposed Local Plan Submission Policy S/CBC, "Movement". [Page 225, paragraph 22.d.iv.]
Last Christmas Eve the Association was told by Stephen Kelly, the two councils' Joint Director of Planning, that after careful assessment, the CBC despite asserting publicly as long ago as 2017 "we are not a short cut", has no effective means of ensuring that only users authorized under the "Cambridge Area G Traffic Regulation Order, Section 31, Prohibition of Driving" can use the CBC's private roads. That the current ANPR system is not fit for purpose, and "a more robust and contemporary solution will be required looking forwards" [Email dated 24.12.25 from Stephen Kelly] - *a solution for which the CBC's Landowners, and no-one else, are directly responsible*. [See Appendix to this response for the Traffic Regulation Order specification of those authorized to use the CBC's private roads]

This is of Cambridge wide strategic significance. The "Addenbrooke's Access Road" located in Trumpington together with the CBC's unenforced private roads are already being used in effect as a Cambridge Southern Relief Road - which has not been built - and was roundly seen off as a proposal using a different route in the early 1990s. *As a direct result*, the level of traffic and associated nuisance on Addenbrooke's Road, and linked roads such as Shelford Road, is way above what was planned for the access road to Addenbrooke's Hospital; and was assumed in the "Cambridge Southern Fringe Area Development Framework" [January 2006, pages 26 - 27] within which the developments of Trumpington Meadows, Glebe Farm and Clay Farm have relatively recently been established.

*This is **entirely unacceptable** to us – as it should also be to the CBC's Landowners whose direct responsibility it is to stop the CBC's private roads being used by 2,000 plus unauthorized users every day.[3] A responsibility in which they have failed for more than a decade - and continue to fail at the very time when Cambridge South Station has just*

[3] As part of the CBC's Movement & Transport Strategy to Support Spatial Framework (including expansion land), the authors KMC Transport Planning reported in 2022 under "Existing Demand Flows":

> "3.4.4 An assessment of rat running was also conducted at the main entrances to CBC on Thursday 12th October 2017. Data was collected between 09.30 and 11.30, 11.30 and 13.30 and 16.30 and 18.30. It found that there is a significant level of traffic between Hills Road and Addenbrooke's Road throughout the day, with approximately 1,680 vehicles travelling between the two entrances in under 10 minutes."

If allowance is made for the unobserved entrance at the junction of Robinson Way and Long Road, it is likely that at that time 2,000 or more unauthorized vehicle drivers used the CBC's private road network each day. This is likely to have increased since then.

opened potentially drawing yet more unauthorized users on to the CBC's private roads – and the Addenbrooke's Access Road in Trumpington.

And what now are the CBC's Landowners proposing on top of all this? Their proposal is -

> "1) Improved Highway Movement and Connectivity in the South
> • The context: A new southern access to CBC would transform connectivity in the south of the city by:
> - creating a new opportunity for buses to bypass congestion along Babraham Road and access the city centre via the existing segregation afforded by the Guided Busway system.
> - reducing the number of private cars using the Hills Road entrance, relieving pressure on the Hills Road entrance to the campus."
> ["Realignment of Granham's Road", CBC Landowners' Submission to the Draft Local Plan, Quod, January 2024]

The means of achieving this is the proposed realignment of Granham's Road, *accessible to the private motor vehicle – cars, vans, and lorries - as well as buses* - allowing private motor vehicle users to access the CBC's private roads freely ***whether or not they are an authorized user***. In other words, creating an unofficial, unapproved, uncontrolled Cambridge Southern Relief Road – *fundamentally undermining* the Southern Fringe Area Development Framework and the Traffic Regulation Order prohibition of driving by unauthorized users on their own private roads. ***Frankly, you could not make it up!***

Unless the CBC Landowners devise and implement a robust contemporary solution to ensure that the CBC's private roads are only used by authorized users – and no-one else – the proposal to realign Granham's Road must be a non-starter.

Yet the two councils in practice are endorsing this reckless policy in the proposed Local Plan Submission. The relevant provision in paragraph 22.a.iv. on page 223, is far too vague and weak. It must be strengthened significantly by the inclusion of a condition that any realignment of Granham's Road in the new Local Plan must be on the strict condition that the CBC landowners have devised, tested, and implemented a modern system which to the satisfaction of the Shared Planning Service following public consultation effectively stops unauthorized users using the CBC's private roads. It must also make crystal clear that if this condition is not met, the proposed realignment of Granham's Road will <u>not</u> be permitted.

<u>A smaller mistake</u>

A smaller point but nonetheless important. The CBC Landowners propose to realign Granham's Road thus creating -

> "A new southern access to CBC" transforming connectivity in the south of the city by:
> - "creating a new opportunity for buses to bypass congestion along Babraham Road and access the city centre via the existing segregation afforded by the Guided Busway system." [CBC submission, Quod. Realignment of Granhams' Road, page 6]

This appears to propose that ordinary non-guided busway buses could use the busway through the CBC and onwards towards Cambridge Station. *There is a significant flaw in this proposal: it is not possible for double decker buses to use the southern section of the guided busway as they cannot be accommodated under Long Road and Hills Road bridges. Only single deck buses could use the busway – subject to there being sufficient busway capacity to cater for the additional movements which appears not to have been ascertained by the Landowners. Account should also be taken of this in assessing the case for a new southern gateway to the CBC via a realignment of Granham's Road.*

Why does the proposed Local Plan Submission assume that, if agreed, the land between the current and proposed alignments of Granham's Road would be removed from the Green Belt and developed?

The proposed Submission assumes that, if realigned, the triangle of land that would be created between the current and proposed alignments of Granham's Road would somehow inevitably be removed from the Green Belt - at Very High Harm. **WHY?**
As the CBC Landowners acknowledge but immediately dismiss in their proposal to realign the road, this is in no way inevitable as the realignment could be achieved at the same time as retaining the triangle of land in the Green Belt. ["Realignment of Granham's Road, page 2] Given the arguments made above, ***if Granham's Road is realigned we see no compelling reason to remove this additional three hectares of land at Very High Harm to the Green Belt*** in addition to the just under 19 hectares canvassed by the two councils in the First Proposals. ***And we object to it strongly.***

Improvement of the City Edge claimed as a benefit by the CBC Landowners

A merit of the realignment proposal claimed by the Landowners is that it would improve the City edge by aligning the CBC boundary with the Worts Causeway development on the other side of Babraham Road. *But why is a straight line city edge thought to be a benefit worth paying for by increasing the area taken out of the Green Belt at Very High Harm? Many city edges including some of the most beautiful are not straight edged*. Frankly, we suspect that the Landowners' dominant motive here is not improving the City edge but rather increasing the area of developable land to their own financial benefit. That the County Council which owns the land concerned, is cash strapped is neither here nor there in terms of the Local Plan Submission, and is not relevant to removing land from the Green Belt causing Very High Harm.

We ask that if the proposal to realign Granham's Road is included in the approved Local Plan 2025-2045, the three hectares between the edge of the CBC and the realigned Granham's Road should be retained in the Greater Cambridge Green Belt. The new edge of the CBC should also be suitably landscaped to help preserve the quality and character of the retained land.

There is an ALTERNATIVE to what is proposed in the Local Plan Submission

This is to agree the additional 22 hectares in the location proposed, and to offset this with a 3 hectare restoration to the Green Belt from the Phase 3 allocation of 8.94 hectares. This would be used *to provide much needed additional protection to the fragile*

Nine Wells Local Nature Reserve which is perilously close to the Phase 3 boundary. ***Were the two councils to be minded to approve inclusion of the proposed 22 hectares CBC expansion in the Local Plan Submission, we recommend this alternative to them and the Planning Inspector.***

Please provide a 100 word summary of your representation.

The Submission does not justify the exceptional circumstances required for the only exception it proposes to its general conclusion that land does not need to be released from the Green Belt.
We are delighted that our proposed amendment to the statement of the Cambridge Biomedical Campus's purpose has been accepted in its entirety. The amendment recognizes that the "unique function" of the CBC is the "tripartite mission" of clinical care, clinical education, and clinical research.
BUT the Campus's estimates of demand have not been reassessed as a consequence, as they must be. If they were, they would be significantly lower than the current estimates. Demand must be reassessed and tested rigorously before any conclusion is reached on yet further extension of the CBC into our Green Belt.
The case is not made for exceptional circumstances, it is simply asserted.
The level of harm to the Green Belt has been misstated. It should be Very High not High.
The two councils have misled themselves, and need to reconsider their proposal accordingly.
There are positive provisions in the Policy. We list the main ones from our point of view.
There is a fatal flaw in the proposal to realign Granham's Road to provide a southern access. There is no mechanism to stop unauthorized drivers using the CBC's private roads – thus aggravating already high through traffic levels to Trumpington's detriment on Addenbrooke's Road as well as the CBC's.

If nonetheless the 22 hectare expansion is approved, we propose a better alternative to use the three additional hectares above the 19 hectare area originally proposed to protect the vulnerable Nine Wells Local Nature Reserve by moving Phase 3 land back into the Green Belt.

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

These are clearly shown in section 3 in bold italics.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	No – not unless the Inspector wishes to question us – in which case we will willingly attend

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes