24th September 2026

Greater Cambridge Planning Service

Andy Moffat

E: [redacted]
M: [redacted]

Botanic House
100 Hills Road
Cambridge CB2 1PH

Dear Sirs,

Proposed Submission Greater Cambridge Local Plan (Regulation 19) consultation

Representations on behalf of Cambridgeshire and Peterborough NHS Foundation Trust in relation to Policy S/AMC/FH: Fulbourn Hospital Area of Major Change

Savills (UK) Ltd Planning Team is instructed by Cambridgeshire and Peterborough NHS Foundation Trust to make representations as part of the Proposed Submission Greater Cambridge Local Plan Consultation in relation to Policy S/AMC/FH: Fulbourn Hospital Area of Major Change.

The Local Plan is to be examined having regard to the National Planning Policy Framework 2024 which required that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

> a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
> b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
> c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
> d) Consistent with national policy.

These representations therefore relate to these tests.

Summary of representations

Cambridgeshire and Peterborough NHS Foundation Trust:

- Welcomes and supports separate policies for Ida Darwin and Fulbourn Hospital sites, and the identification of the Fulbourn Hospital Site as an Area of Major Change in Policy S/AMC/FH;
- Agrees that criteria a., b., and c. of Policy S/AMC/FH are sound;
- Contends that criteria d., and g, are not justified and need to be deleted; and
- Contends that criteria e. and f. need to be justified as necessary in relation to Fulbourn Hospital (as opposed to Ida Darwin Hopsital) or deleted.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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At the time of the Regulation 18 consultation a joint policy was proposed for Fulbourn and Ida Darwin Hospitals (Policy S/RRA/FID). The Regulation 19 Local Plan for the first time includes separate policies for Fulbourn Hospital Area of Major Change (Policy S/AMC/FH), and for Ida Darwin Hospital (Policy S/EOC/IDH).

The separate policies for each Hospital site, and the identification of the Fulbourn Hospital Site as an Area of Major Change, are **welcomed and supported**, but there are changes required to the policy wording of S/AMC/FH to make it sound.

The proposed policy wording is included as Appendix A for ease of reference.

Taking each criterion in turn:

Criterion a. Evidence is submitted to demonstrate the need for the new or upgraded healthcare facility

It is agreed that evidence is required to be submitted to demonstrate the need for new or upgraded healthcare facilities, and this criterion is accepted as being sound.

No change required.

Criterion b. The design, including building heights, massing and materials, responds sensitively and positively to the existing built form and mitigates against unacceptable impacts on the Fulbourn Hospital Conservation Area.

It is agreed that development needs to respond sensitively and positively to the existing built form and mitigate against unacceptable impacts on the Fulbourn Hospital Conservation Area. The reference to "unacceptable impacts" is necessary as the NPPF recognises that there are circumstances where public benefits outweigh harm to heritage assets. This criterion is accepted as being sound.

No change required.

Criterion c. A Heritage Impact Assessment is provided to demonstrate the potential impact of development on the Fulbourn Conservation Area

It is agreed that a Heritage Impact Assessment should be provided as part of any application to demonstrate the potential impact of development on the Fulbourn Conservation Area, and this criterion is accepted as being sound.

No change required.

Criterion d. Access to the countryside is enhanced through the development of a green wedge and open buffers are maintained between the built areas of the site and the Green Belt

Criterion d. is not justified or effective.

The reference to green wedge was a requirement of the redevelopment of the Ida Darwin Hospital site with Policy H/3 of the South Cambridgeshire Local Plan 2018 including "Redevelopment will

create a green wedge on the western part of the Ida Darwin site to provide a compensatory enhancement to the openness of the Green Belt in this location. This green wedge will also provide enhanced public access to the countryside." This requirement is carried forward into Policy S/EOC/IDH: Ida Darwin Hospital of the Regulation 19 Greater Cambridge Local Plan. It is assumed that the reference to green wedge has also been mistakenly taken forward into the Fulbourn Hospital site allocation as well, and it is unclear from the policy wording where such a green wedge is expected on the Fulbourn Hospital site.

Furthermore, the allocated site is wholly within the Green Belt. It is not clear therefore how a green wedge and open buffers can be maintained between the built areas of the site and the Green Belt, as the built areas of the site are within the Green Belt.

Change required: Deletion of criterion d.

Criterion e. An appropriate archaeological assessment has been submitted, given the area's potential for archaeological remains. This must include information on the significance of the heritage asset, including the extent, character and condition of the archaeological resource and the likely impact of the development on the archaeological remains

Criterion e. is not justified.

No archaeological investigation was required as part of recent planning permissions for development at Fulbourn Hospital including the planning permission for the Erection of new Resource Centre planning reference 20/02887/FUL (when the County Archaeological Officer stated "we have no objections or requirements for this development as proposed"), the planning permission for extensions to the ward bedroom wings at George Mackenzie House planning reference S/1523/16/FL, and the planning permission for extension to Mulberry Ward planning permission S/1444/16/FL.

There is the 'Settlement site by Caudle Corner Farm' Scheduled Ancient Monument to the north of the Ida Darwin Hospital site. See extract from Historic England's List Entry for the Settlement site by Caudle Corner Farm Scheduled Ancient Monument reproduced at Appendix B. This requirement was included in the Regulation 18 joint policy for Fulbourn and Ida Darwin Hospitals (Policy S/RRA/FID), and is included in the policy for Ida Darwin Hospital (Policy S/EOC/IDH). It is assumed that this requirement has been mistakenly carried forward into the Fulbourn Hospital Area of Major Change (Policy S/AMC/FH) and should instead now be only included in the policy for Ida Darwin Hospital (Policy S/EOC/IDH).

Change required: Deletion of criterion e. or justification as to why it is applicable to the Fulbourn Hospital Area of Major Change.

Criterion f. Development incorporates mitigation against any noise impacts arising from nearby railway lines

Criterion f. is not justified.

The northern part of the Fulbourn Hospital Site (the Fulbourn Hospital Old Cemetery) is a Designated Green Space in the Fulbourn Neighbourhood Plan (2023) – see figure from Local Plan at Appendix C. All remaining parts of the Fulbourn Hospital Site are distant from the railway lines.

This requirement was a requirement of the joint Fulbourn and Ida Darwin Hospitals policies in the South Cambridgeshire Local Plan 2018 and Greater Cambridge Regulation 18 Local Plan, and may still be justified for the Ida Darwin Site, but it is not considered justified as a criterion for the Fulbourn Hospital site.

Change required: Deletion of criterion f. or justification as to why it is applicable to the Fulbourn Hospital Area of Major Change.

Criterion g. Development accords with the Ida Darwin and Fulbourn Hospitals Development Brief (December 2013).

Criterion g. is not justified.

As the Supporting information to Policy S/AMC/FH: Fulbourn Hospital Area of Major Change states, the Ida Darwin and Fulbourn Hospitals Development Brief highlighted that redevelopment of existing facilities will be needed at Fulbourn Hospital to upgrade local NHS mental health facilities, particularly as Greater Cambridge's population grows and redevelopment of the Ida Darwin Hospital site advances. It was a document of its time, 2013.

Criterion a. (Evidence of need), b. (Design) and c. (Heritage Impact Assessment) of the Proposed Submission Local Plan Policy S/AMC/FH along with the Development Management policies in the Plan provide sufficient management of future development on the site. The reference to a document of its time in addition is not necessary or justified, and risks the ability to deliver necessary further upgrades required as Greater Cambridge's population continues to grow during this plan period.

Change required: Deletion of criterion g.

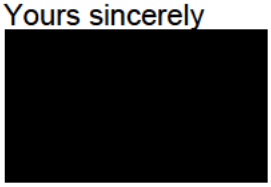
Summary

In summary, Cambridgeshire and Peterborough NHS Foundation Trust:

- Welcomes and supports separate policies for Ida Darwin and Fulbourn Hospital sites, and the identification of the Fulbourn Hospital Site as an Area of Major Change;
- Agrees that criteria a., b., and c. of Policy S/AMC/FH are sound;
- Contends that criteria d., and g, are not justified and need to be deleted; and
- Contends that criteria e. and f. need to be justified as necessary in relation to Fulbourn Hospital (as opposed to Ida Darwin Hospital) or deleted.

Cambridgeshire and Peterborough NHS Foundation Trust requests the opportunity to appear before and be heard by the person(s) carrying out the examination on these matters in order to ensure that these points are fully understood and the necessary modifications to the Local Plan are made.

Yours sincerely



Andy Moffat
Planning Director and Head of Department

Appendix A - Proposed Submission Greater Cambridge Local Plan (Regulation 19) Policy S/AMC/FH, Figure 64 and Supporting Information

Policy S/AMC/FH: Fulbourn Hospital Area of Major Change

1. Development proposals for appropriate new healthcare facilities, will be supported only where:

a. Evidence is submitted to demonstrate the need for the new or upgraded healthcare facility;

b. The design, including building heights, massing and materials, responds sensitively and positively to the existing built form and mitigates against unacceptable impacts on the Fulbourn Hospital Conservation Area;

c. A Heritage Impact Assessment is provided to demonstrate the potential impact of development on the Fulbourn Conservation Area;

d. Access to the countryside is enhanced through the development of a green wedge and open buffers are maintained between the built areas of the site and the Green Belt;

e. An appropriate archaeological assessment has been submitted, given the area's potential for archaeological remains. This must include information on the significance of the heritage asset, including the extent, character and condition of the archaeological resource and the likely impact of the development on the archaeological remains;

f. Development incorporates mitigation against any noise impacts arising from nearby railway lines; and

g. Development accords with the Ida Darwin and Fulbourn Hospitals Development Brief (December 2013).



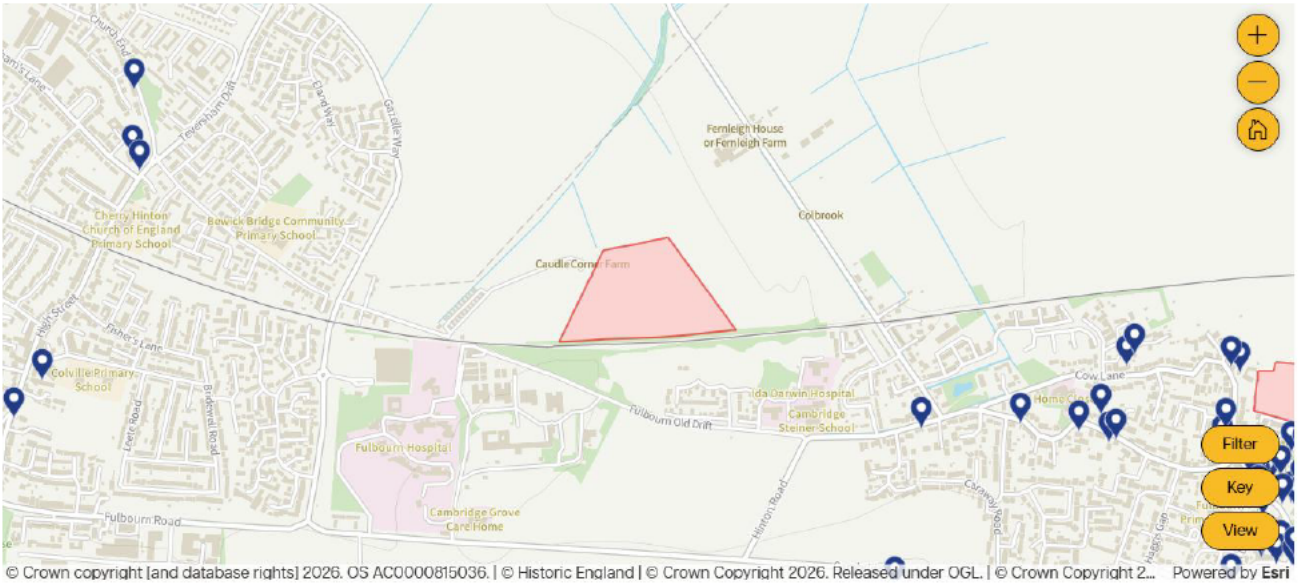
Figure 64: Site Plan of S/AMC/FH: Fulbourn Hospital Area of Major Change

Supporting information

3.2.78. The Ida Darwin and Fulbourn Hospitals Development Brief, endorsed by the Local Planning Authority in 2014, highlights that redevelopment of existing facilities will be needed at Fulbourn Hospital to upgrade local NHS mental health facilities, particularly as Greater Cambridge's population grows and redevelopment of the Ida Darwin Hospital site advances.

3.2.79. Redevelopment within the Fulbourn Hospital area can be accommodated in a way that minimises harm to the setting of the Fulbourn Hospital and Fulbourn Conservation Areas, the nearby Scheduled Monument Settlement site by Caudle Corner Farm, listed buildings and important local views.

Appendix B – Extract from Historic England's List Entry for Settlement site by Caudle Corner Farm Scheduled Ancient Monument



Appendix C – Extract from Fulbourn Neighbourhood Plan (2023) showing Designated Green Spaces outside the Development Framework (west of village)

Fig. 15. Designated Green Spaces outside the Development Framework (west of village)

