Cambridge Biomedical Campus
Innovation and excellence in science and health

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

25 September 2026

Dear Sir / Madam

Regulation 19 publication of the Draft Greater Cambridge Local Plan 2024-2045
Cambridge Biomedical Campus Ltd Representations

I write on behalf of Cambridge Biomedical Campus Limited ("CBC Ltd") to submit representations in response to the Regulation 19 consultation on the Proposed Submission Greater Cambridge Local Plan 2024–2045 ("the Plan"). When adopted, the Plan will form part of the development plan for Greater Cambridge and the basis for decision making.

These representations have been reviewed in the context of the National Planning Policy Framework (NPPF) December 2024, which applies to this Plan as set out at paragraph 1.16 of the draft Local Plan.

The NPPF published on 17 August 2026 provides at Annex A(8) that plans not being prepared under the Levelling-up and Regeneration Act 2023 and the Town and Country Planning (Local Planning) (England) Regulations 2026 are to be produced in accordance with the December 2024 Framework, and the Greater Cambridge Shared Planning Service has confirmed that the Plan will be examined against this Framework.

Paragraph 36 of the December 2024 NPPF provides that a plan is sound if it is:

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;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

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

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.

These representations relate to Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital). CBC Ltd considers that the Plan is legally compliant and that the duty

to co-operate has been met and its proposed amendments are directed to soundness of the Plan.

The modifications set out in Appendix 1 table 1 are those which CBC Ltd considers necessary to make the policy sound and which we have been able to agree with the expansion landowners. At table 2 are those changes which CBC Ltd considers necessary to make the policy sound and which we have been unable to agree with the expansion landowners. The justification for each modification, and the soundness test to which it relates, is set out alongside it.

CBC Ltd are aware that the expansion landowners will be submitting a full response to the Regulation 19 consultation and reserve the right to further comment on this. In particular there are some changes being considered by the expansion landowners to which we would strongly object if formally proposed.

Policy S/CBC: Cambridge Biomedical Campus

CBC Ltd strongly supports the Councils' recognition of the Campus as a globally significant centre for healthcare, life sciences and clinical research.

CBC Ltd considers that aspects of the current drafting of Policy S/CBC would not deliver the coordinated and comprehensive growth that the policy itself seeks. As such, the proposed modifications set out at Tables 1 and 2 of Appendix 1 seek to address these matters by clarifying how growth should take place on the Campus and by strengthening the masterplan-led approach, so that the policy supports the comprehensive, coordinated and enforceable spatial approach that paragraph 29 requires.

Principally, the masterplan is central to the delivery of the policy, but its details are not established. As drafted, paragraphs 10 and 30 require a whole Campus Masterplan prepared "with input from" and "engaging" existing campus landowners and major occupiers. Our members strongly oppose this approach which could allow other parties to develop plans for their assets on the existing campus without their agreement. The proposed amendments at Appendix 1 table 2 require the masterplan to be co-produced with existing landowners and major occupiers so that all parties have certainty as to what is required and when. Furthermore, the requirement for this should remain as a major application on the phase 3 or 4 'expansion' land and not significant development on the existing campus.

CBC Ltd recognises that the exceptional circumstances case justifying the release of greenbelt land for campus expansion needs to be based on guaranteeing the delivery of a world-class place. The centrality of this was contained in letters to the expansion landowners dated 29 February 2024 and 29 April 2025 making clear the conditions under which CBC Ltd could support the case to release greenbelt land (Appendix 3). This required the agreement between all affected parties of an Infrastructure Delivery Strategy (IDS). Unfortunately, despite extensive work to date the nature and extent of this strategy, and the commitments it secures are yet to be settled.

The policy does not deal adequately with future development on the existing Campus in relation to trip generation and wording is proposed to make this clear. There is also suggested additional wording relating to the development of campus wide solutions for securing local employment and affordable workspace.

Regulation 18 Draft Local Plan

CBC Ltd submitted representations to the Greater Cambridge Shared Planning Service at the Regulation 18 Draft Local Plan stage.

This representation is included at Appendix 2 for ease of reference and remains relevant.

Concluding Remarks

I 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.

The matters raised concern the deliverability of a strategic allocation of national significance and cannot, in our view, be resolved in writing alone. CBC Ltd therefore wishes to participate in the examination hearing sessions dealing with Policy S/CBC and the Cambridge Biomedical Campus allocation. It should be noted that if the changes proposed are not adequately reflected then CBC Ltd reserves the right to oppose the principle of the allocation of the greenbelt land.

CBC Ltd also requests to be notified of the submission of the Plan for examination, the publication of the Inspector's report and the adoption of the Plan.

Yours faithfully



Peter Denton CBE

Chair, Cambridge Biomedical Campus Ltd

cc:

Anthony Odgers and Graham Matthews - University of Cambridge
Mike Keech- Cambridge University Health NHS Trust
Jan Lowe - Lab of Molecular Biology
Gillian Johnson - Abcam
Shaun Grady - Astra Zeneca
Eilish Midlane - Royal Papworth NHS Trust
Steve Grange - Cambridge and Peterborough Foundation NHS Trust

Appendix 1 - Cambridge Biomedical Campus Limited Representations to the Regulation 19 publication of the Draft Greater Cambridge Local Plan 2024-2045 Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)

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 *red italics* 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 S/CBC text where we are proposing changes. Deletions from the draft policy wording are shown struck through in red. The justification for each amendment, and the soundness test to which it relates, is set out in the right hand column of the schedule below.

Table 1: Proposed changes which we have **been able to agree** with the expansion landowners

Policy Paragraph number	Notes
Paragraph 9 - Land at the Cambridge Biomedical Campus as shown on the Policies Map and indicative Spatial Framework (Figure 54), including land removed from the Green Belt adjoining Babraham Road (shown in Figure 55), is allocated for a mix of uses contributing to health and life sciences, commercial, education and innovation floorspace, including *those listed below. The final quantum, distribution and mix of floorspace shall be informed by the Campus Masterplan set out in paragraph 30.* a. Healthcare provision serving local, regional and international needs, including new and updated NHS buildings and supporting clinical infrastructure; b. Approximately ~~*525,000*~~ *650,000* net square metres (Gross Internal Area, excluding ~~*the*~~ *internal and external* plant) for additional biomedical, biotechnology and life sciences research and development*;* *related,* ~~*including*~~ commercial uses; ~~*and*~~ medical research institutes; and *higher education uses for academic teaching and research, training facilities supporting the development and retention of healthcare related skills and talent.* c. ~~*Approximately 120,000 square metres (Gross Internal Area) of higher education uses for academic teaching and research, training facilities supporting the development and retention of healthcare related skills and talent, and o*~~ *Other* supporting uses including hotels and leisure facilities; and d. *C*~~*c*~~apacity for approximately 1,000 additional homes on the campus*.*	**Soundness: effective.** The policy should make clear that the Campus Masterplan should inform the final quantum, distribution and mix of uses which come forward.

Uses section of Policy S/CBC to include new paragraph 13 – *Where a requirement arises for:* • *An Employment and Skills Plan by Policy WS/IO (creating inclusive employment and business opportunities through new developments); and / or* • *Affordable workspace by Policy J/AW Affordable workspace and creative industries;* *The delivery of the policy response to meet the requirement should be viewed in the context of the Campus as a whole and how its purpose can be best supported and delivered to maintain the world class status.*	Soundness: justified; effective. Amended wording is also proposed to make clear that where requirements arise from Policy WS/IO (creating inclusive employment and business opportunities through new developments) and Policy J/AW (affordable workspace and creative industries) that the detail of what is delivered should be reviewed in the context of the Campus as a whole and how its world class function can best be both supported and maintained.
Paragraph 23 - The agreed whole Campus masterplan, as required at paragraph 30 must demonstrate how: a. The distribution and mix of development achieves optimal transport outcomes, including high levels of site trip internalisation, the spreading of peak hour trips, and high active and public transport mode shares; and b. The quantum and mix of development can be delivered within the agreed trip budget. A definitive trip budget based on detailed evidence must be agreed with the Local Highways Authority prior to submission of the outline application. A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery. *Future development on the existing Campus should demonstrate that it can occur without giving rise to unacceptable highway impacts.*	Soundness: justified; effective. As drafted it is unclear whether the trip budget applies to further development within the existing Campus. The proposed wording confirms that such development is to be assessed on the basis of its own highway outcomes.
Paragraph 31 - A comprehensive Campus-wide Masterplan will be expected to: a. Address key requirements across the Campus such as access and movement, land uses, green and blue infrastructure, scale and massing and densities; and b. Set out the layout, mix and scale of uses, including the relationship with the existing Campus composition; c. Evidence a demonstrated 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	Soundness: effective. An agreed Infrastructure Delivery Strategy, funded and delivered through enforceable mechanisms, is necessary for the policy to be effective. The proposed amendment seeks to clarify that this should be agreed and also clearly demonstrate that the necessary infrastructure is capable of being funded for delivery.

leading Campus, and how these needs will be met, including proposed phasing and funding approach; d. Set out full Phasing Plans, including any further planned development or redevelopment in early phases of the Campus and measures for the Phasing Plan to be updated when necessary, in agreement with the Local Planning Authorities; e. Include an *agreed* Infrastructure Delivery Strategy, *based on open, transparent and credible viability assessments of the expansion land* identifying site-specific and strategic infrastructure requirements to help achieve the vision for the Campus as well as wider Campus enhancement set out in the indicative Spatial Framework and masterplan, and demonstrating ~~*how*~~ *that* this can be 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; f. Provide a detailed transport assessment including the delivery of sustainable transport and active travel onto and across the Campus; g. Provide clear and enforceable strategies for delivery, management and stewardship of shared facilities and public realm in the proposed application area; 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; i. Implement an Amenity Strategy, considering the overall contribution of proposals on the quality of place on the Campus; j. Where appropriate, provide a Meanwhile Use 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; and k. Identify how Phases 3 and 4 will integrate with the existing Campus and life-science function.	

Table 2: Proposed changes which we **have been unable** to agree with the expansion landowners

Policy Paragraph number	Proposed justification / notes
Paragraph 10 - 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*~~ *co-produced with all existing landowners and major occupiers across the Campus and approved prior to submission*, will be required prior to any major application being approved within land which forms part of Phase 3 or Phase 4 (identified as land proposed for Green Belt release). Given the range of existing and proposed uses and continuous/cyclical nature of the Campus, an 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 across the Campus to achieve this, and proposals that include these uses will need to: a. Support the needs of the campus users throughout the day and night; 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 off the Campus; c. Ensure they do not compromise the operational needs of the Campus; and d. Enhance the vibrancy of the Campus and the visitor, patient and employee experience.	**Soundness: effective.** The whole Campus Masterplan is the central delivery mechanism of Policy S/CBC, but the policy as drafted does not provide enough detail on how this will come forward and who should contribute. Preparation "with input from" landowners and occupiers should be strengthened to secure the comprehensive development of a Campus Masterplan. Requiring the masterplan to be co-produced with all existing landowners and major occupiers gives all parties certainty as to what is required and when and makes the requirement capable of being applied consistently in decision making. Failure to use this wording undermines the case for supporting the principle of allocating the greenbelt expansion land.
Paragraph 22 part B - Deliver an exemplar approach to connectivity and movement within and through the site, promoting sustainable transport, inclusive access, and active travel by: b. Setting aside land for and directly delivering the following physical transport measures within the site:	**Soundness: effective.** Work on deliverability demonstrates that the east west link delivery is dependent on removal of the main hospital food court, and the significant theatre block above. We anticipate that the most likely solution for their reprovision, is through the delivery of a new Acute Hospital on the campus, which is

i. ~~*A new east–west 'high street' for active travel and public transport, to improve the permeability of the site*~~; ii. Improvements to key routes for walking, wheeling and cycling, including Francis Crick Avenue, Dame Mary Archer Way, Robinson Way and Puddicombe Way; iii. Focused enhancements to improve safety at key junctions for all road users, including the Guided Busway / Francis Crick Avenue junction and the Addenbrooke's roundabout; *iv.* A network of Mobility Hubs at key interchanges, including adjacent to Cambridge South station and bus interchange(s). *In addition, steps should be taken to safeguard the future delivery of a public transport and active travel connectivity east west along Main Drive, connecting the Addenbrooke's Roundabout, via Main Drive, to Keith Day Road, recognising that such delivery will likely be beyond the plan period given the ongoing use of the site by the Addenbrooke's Hospital food court and theatre block. It is recognised that delivery will be subject to significant alternative sources of funding.* v. Consolidation of new or re-provided car parking into Mobility Hubs wherever possible, providing high-quality cycle parking, shared mobility infrastructure, and accessible transport for all users. New permanent surface parking should be limited, with provision of short-stay drop-off and pickup bays and blue badge spaces sensitively planned for with dropped kerbs with short distances to hospital, research facilities and offices; and vi. A network of delivery and consolidation hubs and a last mile delivery system, exploring the use of dynamic kerbside management and other emerging technologies.	subject to a business case approval process, the timing of which is uncertain. The ambition to realise a public transport and active travel link through the site remains important but is not deliverable in the near term, with delivery most likely outside of this plan period.
Paragraph 24 - To support delivery of the agreed campus wide masterplan, a strategic and local transport mitigation plan will be co-	Soundness: effective.

developed ~~*with input*~~ *with all* the key landowners and major occupiers across the existing and expanded campus *and approved prior to submission*, must be prepared by the applicants for Phases 3 or 4 for agreement with the Local Highways Authority and Local Planning Authority. This must include: a. Sustainable transport measures, including high-quality mobility services that prioritise modal shift; b. Vehicular transport measures, including site access arrangements and a strategy for managing and restricting through-traffic of private vehicles through; c. A framework of measures to optimise freight activity as the Campus expands, including implementing data capture devices such as Automatic Number Plate Recognition (ANPR) that can monitor freight activity across the campus, allowing for impacts to be analysed; 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.	Consistency with the amendments to paragraphs 10 and 30.
Paragraph 30 - There are a range of matters that will need to be fully addressed before further development will be supported. To address these, a comprehensive masterplan ~~*engaging*~~ *- co-produced with all existing landowners and major occupiers across the Campus and approved prior to submission* must be prepared and agreed with the Local Planning Authority prior to or alongside the submission of an outline planning application for Phases 3 or 4, in order to demonstrate how any further expansion of the campus will secure the overall objectives for the campus.	Soundness: effective. Consistency with the amendments to paragraphs 10 and 24.

Appendix 2: CBC Ltd Regulation 18 Representation dated 30 January 2026

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

[redacted]

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
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.	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.
New heading and new para 8 ***Cambridge Biomedical Campus Masterplan*** *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:* *1. Prior to any major application being approved within land which forms part of Phase 3 (which*	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. 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.

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.* *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.* *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.* *The whole campus masterplan will be expected to:* 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;* 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;* 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;* D. *Set out the proposed phasing for development across the Campus:*	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.

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*	

and active travel onto and across the Campus; *N. Identify how the phases 3 and 4 will integrate with the existing Campus and life science function;* *O. Include a comprehensive amenity strategy ;* *P. Detail how the Masterplan will satisfy the policies of the Local Plan; and* *Q. Demonstrate how the whole Campus masterplan will protect and enhance the natural environment and ecological networks by achieving net gains in biodiversity.* *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.*	
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.	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.
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: *a. Support the needs of the campus users throughout the day and night;* *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;*	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.

c. Ensure they do not compromise the operational needs of the Campus; *d. Enhance the vibrancy of the Campus and the visitor, patient and employee experience.*	
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.	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.
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: *a. delivery of biodiversity enhancements, while accommodating appropriate amenity, recreation, and wellbeing functions;* *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;* *c. existing agricultural, grassland and woodland habitats are enhanced, improving ecological links between Nine Wells LNR and Gog Magog Hills;* *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.*	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.

Para 18 - Proposals in the Landscape Improvement Area, which are expected to come forward following works in the Strategic Enhancement Area, must: *a. Create and/or enhance existing ecological corridors between the nature reserves of Nine Wells and Beechwoods;* *b. Establish high quality active travel routes from Limekiln Road into the southern end of the Campus;* *c. Incorporate natural drainage features which specifically addresses surface water flood risk associated with the expansion land north of Granham's Road.*	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.
New para 20 – Securing Public Space *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.*	It is welcomed that the importance of public spaces and place shaping is recognised under the public space section. 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.
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: *a. Sustainable transport measures;* *b. Indicative costings;* *c. Phasing; and* *d. Potential delivery via a Section 106 agreement or CIL.* *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:* *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*	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.

identified in Figure 65 as land proposed for green belt release. *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.*	
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.	The proposed amendment seeks to reinforce the proposed masterplan policy approach throughout the site allocation.
~~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:~~ ~~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~~	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.

~~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;~~ ~~f. Clear and enforceable strategies for delivery, management and stewardship of shared facilities and public realm;~~ ~~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;~~ ~~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".~~	
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.	The proposed wording seeks to bring the need for phasing plans in line with the proposed masterplan policy for the site allocation.
Supporting Text	**Proposed justification / notes**
Para 3.2.30- 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.	The proposed amendments seek to reflect the proposed approach in regard to a masterplan led approach which would also include an Infrastructure Delivery Plan. Furthermore, the policy should not be contingent on the identification of a delivery body and amended wording is proposed.

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*.	

Appendix 3: Letters to expansion landowners setting out CBC Ltd Conditions for support 29 February 2024 and 28 April 2025

Cambridge Biomedical Campus
Innovation and excellence in science and health

28 April, 2025

Re: Restating CBC Ltd conditions in supporting the Local Plan submission

Dear Landowners,

The workshop on 24th April provided a welcome insight into the recent progress that has been made between your organisations in agreeing the basis for a commercial deal on the Cambridge Biomedical Campus expansion Land. We now face a critical moment in time which has the potential to determine the long-term future for the campus. It is therefore with the intention of supporting your collective endeavour that I am restating the steps which will enable CBC Ltd Directors to take a joint position on the Local Plan submission or to support anything you submit unilaterally. None of what follows are new conditions for our support.

Spatial framework
The 2024 spatial framework represents an important milestone for the campus, setting out in detail the composition and timeline for delivering optimal development across all phases of the campus. Should there be any expected change to the special framework, we will require a reasonable opportunity to understand and review. Noting the statement at the partnership board on 4th April that there would be no change to the special framework, we are not anticipating any issues. At the workshop on 24th April, there seemed some indication that de-coupling phases 3 and 4 would be part of future plans, in which case an update to the 2024 Spatial Framework will be necessary. Your clarification on this point, along with any other changes (such as the timeline for development) will be important ahead of the local plan submission.

Specific requirements set out in 2024
In February 2024, CBC Ltd wrote to you setting out our conditions for supporting the 2024 Spatial Framework (appendix 1). These comprise:

i. Receipt and agreement by CBC Ltd of an Infrastructure Delivery Plan (IDP) for the entirety of the campus. And that this should include dates for its start and phased implementation over the lifetime of the campus masterplan programme. Confidence over the deliverability of the IDP will require an updated economic model at the right point in the process for developing the new Local Plan.
ii. Receipt, agreement, and implementation of an acceptable long term Transport Strategy covering the campus as a whole.
iii. The early engagement with healthcare providers about the prioritisation of a plot on the expansion land (phase 4) for new healthcare facilities with due consideration to the requirements for community and mental health services.
iv. Setting out and undertaking a programme for engagement with the surrounding community to explain the HSF changes before the updated proposals become part of the GCSP consultation on a new draft Local Plan. This work to be led and funded by the LCG.
v. There should be a legally binding mechanism covering current and future landowners/ developers which will secure delivery of the holistic vision (current or future iterations thereof) including infrastructure and transport, to improve the campus in its entirety (a point CBC Ltd and Landowners had jointly agreed in correspondence with national government in 2023)

Within these our immediate focus in relation to the local plan timeline is on infrastructure and how commitments will be made binding.

Deliverability
In summer 2023, the leadership of Cambridge University Hospitals and the University of Cambridge made the case on behalf of the campus to local councillors that an exceptional need could be demonstrated in support of greenbelt release for development on the expansion land. There followed an expectation that a credible delivery model would be central to securing a

future local plan allocation. In order to provide our organisations with assurance over this critical matter of deliverability, we repeat the request made at the workshop on 24th April for further information concerning the commercial deal which you are negotiating. Of paramount concern will be the overall timeline for delivery, the commercial development model and they expected quantum of funding which can be committed to support infrastructure investment.

Our board welcome the opportunity to engage directly with your three organisations on these key areas. Being able to objectively consider the detail will enable us to make an effective contribution to the local plan process.

We recognise the challenging timeline ahead of us and are considering what a pragmatic and proportionate way will be to demonstrate assurance against these requirements.

Your sincerely

[redacted]

Laurel Powers-Freeling
Chair, CBC Ltd

cc. CBC Ltd directors
Peter Freeman, Chair Cambridge Growth Company
Stephen Kelly, Director Greater Cambridge Shared Planning

APPENDIX 1: CBC Ltd Letter

Cambridge Biomedical Campus Landowners Collaboration Group
c/o Quod
21 Soho Square,
London
W1D 3QP

Attn Gregory Blaxland

cc: Aphrodite Stathopoulou, Allies and Morrison

By email

29 February 2024

Dear Greg,

Re: Changes to the Holistic Spatial Framework

Thank you for sharing the outputs of the work that the Landowners Collaboration Group (LCB) have been leading on the future of the Cambridge Biomedical Campus (CBC). This letter is from the Directors of CBC Ltd (CBCL) and is based on the materials produced by the Landowners Collaboration Group (LCG), dated 22 December 2023. These were supplemented by further clarifications submitted to CBC on 8 and 12 February 2024.

CBC Ltd Directors recognise, and are grateful for, the progress that has been made in evolving the Holistic Spatial Framework (HSF) for the future of the Campus. We are pleased that ownership of driving forward the Framework has been taken up by Landowners and that the important principle outlined by Greater Cambridge Shared Planning Service (GCSP) of advancing the campus as a whole is being pursued.

Whilst noting this progress we will continue to express reservations about deliverability of the campus vision expressed through the HSF until we are satisfied in relation to the matters listed at points i. to v. below:

I. Receipt and agreement by CBCL of an Infrastructure Delivery Plan (IDP) for the entirety of the campus. And that this should include dates for its start and phased implementation over the lifetime of the campus masterplan programme. Confidence over the deliverability of the IDP will require an updated economic model at the right point in the process for developing the new Local Plan.
II. Receipt, agreement, and implementation of an acceptable long term Transport Strategy covering the campus as a whole.
III. The early engagement with healthcare providers about the prioritisation of a plot on the expansion land (phase 4) for new healthcare facilities with due consideration to the requirements for community and mental health services.

IV. Setting out and undertaking a programme for engagement with the surrounding community to explain the HSF changes before the updated proposals become part of the GCSP consultation on a new draft Local Plan. This work to be led and funded by the LCG.
V. There should be a legally binding mechanism covering current and future landowners/ developers which will secure delivery of the holistic vision (current or future iterations thereof) including infrastructure and transport, to improve the campus in its entirety.

CBC Ltd reserve the right to review our support for the LCG's proposals for campus expansion at any point if conditions, plans and details, either in design or implementation, are considered inadequate to fulfil the vision.

We will lobby the Greater Cambridge Shared Planning Service (GCSP) to ensure that while the basis of our support is clear, any planning policy and/or planning application for the campus will have sufficient legally enforceable safeguards in place to secure delivery of the agreed Infrastructure and Transportation objectives for the campus as a whole.

Thank you once again for your work on setting out this iteration of the framework for the development and growth of the entire campus. We look forward to continuing to work with you through the Partnership Board, discussions with GCSP and the Cambridge 2040 team to realise our shared ambitions.

Yours Sincerely,

Laurel Powers-Freeling - Chair, CBC Ltd
Mike Keech - Cambridge University Hospitals NHS Foundation Trust
Anthony Odgers - University of Cambridge
Jan Lowe - MRC Laboratory of Molecular Biology
John Baker - Abcam
Eilish Midlane - Royal Papworth NHS Foundation Trust
Penny James - AstraZeneca
Scott Haldane - Cambridge & Peterborough NHS Foundation Trust