Babraham Research Campus
Babraham Research Campus Ltd
Bidwells LLP
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BIDWELLS

BABRAHAM RESEARCH CAMPUS FIRST PROPOSALS CONSULTATION (REGULATION 18)

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1.0 Introduction

1.1 These representations on the 'First Proposals' (Regulation 18) draft of the emerging Greater Cambridge Local Plan ("Local Plan") are prepared by Bidwells LLP on behalf of Babraham Research Campus Ltd ("BRC Ltd"), who in turn represent the Campus partners (The Babraham Institute, BBSRC, and BRC Ltd). They are prepared in respect of Land at Babraham Research Campus. A Site Location Plan is included at **Appendix 1**.

1.2 These representations follow those submitted in June 2020 to the 'First Conversation' Issues and Options consultation on the Local Plan by BRC Ltd.

1.3 The First Proposals consultation document sets out the Councils preferred approach to the level of growth that should be planned for, and where it should be planned over the plan period to 2041. It also describes the planning policies proposed to shape development and guide planning decisions. The First Proposals consultation is particularly seeking views on the emerging development strategy, the direction of travel for policies and issues the Councils should be considering as policies are prepared.

1.4 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) lists and maps sites within Greater Cambridge that may have potential for residential and economic development. A 'Red, Amber, Green' (RAG) scoring system was used to carry out the assessment. Sites were deemed to be unsuitable if they were assessed as 'red' against any of the criteria used.

1.5 The HELAA forms part of the evidence base for the emerging Greater Cambridge Local Plan and the outputs of the HELAA will assist the Councils in identifying the choices available for site allocations to meet development needs. Specifically, it has been used to inform the choices made at the First Proposals consultation stage, alongside a range of other evidence exploring the development needs of the area and how they should be met.

1.6 Babraham Research Campus has been identified in the HELAA under site reference 51604 and 51604a. It is assessed as suitable, available and achievable.

1.7 The Babraham Research Campus is one of the UK's leading locations to support early-stage bioscience enterprise and is distinct in its co-location of bioscience companies with the world leading discovery research of the Babraham Institute, a world-renowned research organisation that receives strategic funding from the Biotechnology and Biological Sciences Research Council (BBSRC).

1.8 The Campus provides emerging and growing Bioscience companies laboratory and office space, with the underpinning operational support, networking and collaboration opportunities, together with access to outstanding scientific facilities in an ideal geographical location at the core of the Cambridge Southern Research Cluster.

1.9 The First Proposals consultation document recognises the need to support the continued success of this nationally important facility. As such, the built-up area of Babraham Research Campus and land immediately adjoining it, is currently identified within the consultation document, under **Policy S/BRC**, as a Policy Area. The proposed policy direction is stated as:

- *Remove the developed area of the Campus from the Green Belt.*
- *Remove from the Green Belt and allocate an additional area for employment development (research and development) of 17.1 hectares within and adjoining the existing built area of the campus.*
- *Identify the whole site release from the Green Belt as a Policy Area, requiring any proposals to:*
  - *Restrict development to research and development (use class (E(g)(ii) Research and development of products or processes) and appropriate supporting ancillary uses and infrastructure.*
  - *Protect and enhance the landscaped setting of the site*
  - *Preserve the appearance of the conservation areas, and the setting of the Grade II Listed Babraham Hall and the Grade I Listed St Peters Church.*
  - *Protect and enhance the corridor of the River Granta (recognised as a county wildlife site)*
  - *Take steps to include sustainable travel opportunities, including the opportunities provided by the planned Cambridge South East Transport Scheme.*
  - *Retain the area of The Close as key worker and affordable housing to support the needs of the Campus. Any future renovation or replacement should retain the low density character, which responds to the sensitive village edge location*

1.10 These representations broadly **support draft Policy S/BRC** and provide further detail and justification to support the case for the BRC expansion and its removal from the Green Belt. In addition, further detail is provided in respect of the emerging masterplan for the Campus which has been informed by a suite of technical assessments.

1.11 BRC Ltd also broadly **support draft Policy S/DS and draft Policy J/NE.**

1.12 BRC Ltd is still at an early stage in developing their emerging masterplan for the Campus and are keen to engage with the Council, stakeholders and the local community to refine and discuss the proposals further as part of the ongoing consultation on the emerging Greater Cambridge Local Plan.

1.13 These representations should be read alongside the following documents, bound separately as appendices, that provide further background information:

- Appendix 1 : Site Location Plan
- Appendix 2 : ‘Our Plan for Future Growth’ Vision Document
- Appendix 3 : Socio-Economic Assessment – Bidwells LLP
- Appendix 4 : Landscape and Visual Appraisal and Green Belt Study – Bidwells LLP
- Appendix 5 : Initial Built Heritage Appraisal – Bidwells LLP
- Appendix 6 : Archaeological Assessment – Cambridge Archaeology Unit
- Appendix 7 : Preliminary Ecological Appraisal - The Landscape Partnership
- Appendix 8 : Transport Strategic Overview and Access and Movement Strategy – Stantec
- Appendix 9 : Sustainability Statement – Hoare Lea

2.0 Background

The Site and Surrounding Area

2.1 The Babraham Research Campus extends to circa 450 acres and lies on the north-west side of the village of Babraham, circa six miles south of Cambridge.

2.2 The main developed area of the Campus is bound by the River Granta to the south, Babraham High Street to the east, the A1307 to the north and an existing tree belt to the west.

2.3 There are currently over 60 companies, with 1,500 employees, and 300 academic researchers at the Campus. The research and development buildings within the developed area of the Campus are located on the north-west and south-east side of Babraham Hall, a 19th century Grade II Listed Building and the Grade I Listed Church of St Peter. The facilities buildings are broadly split into three elements;

- **ACCELERATE@BABRAHAM** provides support to the earliest stages of new lifescience ventures, via easy-access laboratory and office space, combined with additional support programmes;
- **The Start-Up buildings** are designed to support the early stage needs of new life-science ventures by providing easy-access laboratory and office space in units from approximately 56m2 (600sq.ft) on short flexible lease terms;
- **The Scale-Up buildings** consist of bespoke R&D laboratory and office space; and
- **The Academic facilities** comprising the Institute buildings (circa 10,000m2) and the MRC ARES facility (3,500m2).

2.4 In addition, Buildings B940/B950 comprise approximately 9,214m2 (99,180sq.ft) of floorspace and are owned and operated by Biomed, which have a variety of undertenants and Building B900 comprises approximately 4,000m2 of floorspace and is owned and operated by Kadans. Both the Biomed and Kadans buildings are managed and run by BRCL under a Building Services agreement.

2.5 The developed area of the Campus also includes a residential area comprising 40 homes for those who have a direct link with the Campus (known as 'The Close), together with a Nursery owned and run by the Babraham Institute.

2.6 The remaining part of the Campus north of the River Granta comprises circa 39 hectares of parkland to the north of Babraham Hall.

2.7 The Campus estate to the south of the River Granta largely comprises arable farmland, pasture for livestock grazing or areas planted with woodland or set aside as conservation areas on field and river margins.

2.8 In addition, the Campus in-house estates support team are located on the site of an existing complex of former farm buildings which have been converted.

2.9 Furthermore, circa 3.5 hectares of land within the south-eastern corner of the Campus comprises Babraham Cricket Club Cricket Field which is used by the Sawston and Babraham Cricket Club, under a long term agreement and is available for use by the Campus and the local community.

2.10 Two further parcels of land within the Campus estate, to the north of the River Granta but further west and beyond the developed part of the Campus, comprise arable farmland.

2.11 Vehicular access to the Campus is obtained via a roundabout off the A1307 at the north-western edge of the grounds. Vehicular access is not authorised from any other point within or surrounding the Campus, however emergency access and Campus operational teams to access The Close and Nursery is permitted from Babraham village.

2.12 Pedestrian and cycle access is also available from the A1307, with improvements to pedestrian and cycle infrastructure currently being implemented and proposed as part of the Greater Cambridge Partnership's Cambridge South East Transport scheme (CSET).

2.13 There are existing bus stops within 0.1km of the Site on the A1307 Cambridge Road. These provide services to Cambridge City, Haverhill and the surrounding villages. Significant improvements to the site's public transport accessibility would also be delivered as part of CSET.

2.14 Pedestrian and cycle access is also available through the Campus from Babraham village High Street, to the east of the Campus. There is a public footpath that runs to the southwest of the Campus which also provides pedestrian access to the site. There is also access for cyclists and pedestrians along Rowley Lane bridleway via the farm entrance road.

The Emerging Proposals

2.15 In 2003 a Masterplan was approved by South Cambridgeshire District Council which laid down the principles for the future development of the Campus in a manner which protects and enhances the historic characteristics of the Campus. Whilst many of the objectives of the Masterplan have now been achieved, including the removal of substandard post war buildings and the creation of a new site access, the general approach in respect of the location, scale and appearance of buildings and landscaping continue to be of relevance and will inform the development and design parameters of any future expansion of the Campus.

2.16 Furthermore, a suite a technical assessments have been undertaken to identify key constraints and opportunities to inform the updated emerging illustrative masterplan for the Campus expansion. A copy of the emerging masterplan is included in the Vision Document.

2.17 The emerging proposals include for the following:

- R&D Development Zone (5 hectares)

  Expansion comprising **circa 23,440sqm of net additional R&D floorspace** on undeveloped land to the immediate edge of the Campus;

- R&D Redevelopment Zone (4.4 hectares)

  Circa 5,430sqm of net additional R&D floorspace on previously developed land within the existing Campus;

- Housing, Amenity and Community Zone

  Low density redevelopment of existing 40 dwellings on site to be replaced with up to **160 new dwellings, 930sqm of new nursery provision and a small new retail provision**, for campus staff key workers, visiting scientists and PhD students at the Campus. The redeveloped residential area will also include for;

  - A **community meeting point** or 'plaza', connected to the Campus cycleway;

  - A **new local play area** to provide an active space for children from the development or local village to play and socialise.

  Retention of **circa 3.5 hectares of amenity land** within the south-eastern corner of the Campus which currently comprises the Babraham Cricket Club Cricket Field, for the use of the Cricket Club, Campus and the local community;

  A **community orchard** and **'Common' area** within the south of the Campus, adjacent to the community planting area (Forest Garden), local school and cricket pitch.

- Supporting Infrastructure and Renewable Energy Zone

  Redevelopment of existing farm complex to accommodate **circa 2,950sqm of new estate facilities accommodation** and provide a foundation to deliver on-site renewable energies on land to the south of the River Granta.

- Historic Parkland and Estate

  Retention of circa 39 hectares of historic parkland in the north of the Campus as open space in order to preserve the setting of the Babraham Conservation Area, Babraham Hall and the Church of St Peter;

  Retention and management of circa 60 hectares of woodland or areas set aside as conservation areas on field and river margins;

  A further circa **17 hectares of land has been identified as land within which additional woodland could be created for carbon offsetting and increasing biodiversity;**

  Retention of circa 150 hectares of land that comprises arable farmland or pasture for livestock grazing

2.18 In addition to the above, a series of new permissive paths are proposed to provide an additional link between the existing public footpath adjacent to the River Granta and the Rowley Lane Bridleway which allows a circular route utilising additional rights of way, opportunities to access wider areas of the Campus and the provision of a short circular walk to the south of the River.

2.19 Further detail on the emerging masterplan is included in the 'Our Plan for Future Growth' Vision Document (**Appendix 2**).

3.0 Economic Context

National Planning Policy

3.1 National Planning Policy (NPPF, Paragraph 8a) identifies the economic objective of the planning system:

"…to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure…"

3.2 NPPF Paragraph 81 builds upon this:

"***Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*** *The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential*." (emphasis added).

3.3 The Babraham Research Campus is a globally important research cluster in its own right, as well as being part of the wider Cambridge Southern Research Cluster and the Oxford, Cambridge, London 'Golden Triangle' of research, development and innovation. It is an area of high productivity. It is therefore precisely the type of location where paragraph 81 is intended to be given significant weight.

3.4 NPPF Paragraph 82 states that:

"a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."

3.5 NPPF Paragraph 83 then states that;

"*planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries*"

National Economic and Industrial Policies

Life Sciences Industrial Strategy – A report to the Government from the life sciences sector (2017)

3.6 The Governments Life Science Industrial Strategy[1] recognises that the UK is the European leader in life science research. The latest indicators show that the UK continues to perform well but has more to do to compete with the US and emerging economies.

3.7 To facilitate growth, the Strategy recommends that "*Government, local partners and industry should work together to ensure the right infrastructure is in place to support the growth of life sciences clusters and networks".*

Life Sciences Sector Deal (2017)

3.8 The Life Sciences Industrial Strategy was followed by the Sector Deal, which was backed by 25 global companies, and provides funding to *"help ensure new pioneering treatments and medical technologies are produced in the UK, improving patient lives and driving economic growth",* involving "*substantial investment from private and charitable sectors and significant commitments in research and development from the government".*

Life Sciences Vision (2021)

3.9 Building on the previous Life Science Industrial Strategy, the Life Sciences Vision states that;

"The collective ambition of the Government and the Sector is for the UK to build on the scientific successes and ways of working from COVID-19 to tackle future disease challenges – silent pandemics – including cancer, obesity, dementia, ageing; securing jobs and investment and becoming the leading global hub for Life Sciences."

3.10 As part of this, the Government intends to work with the Sector to;

"Establish a Life Science Scale Up Taskforce to drive progress on the ease with which Life Science companies can start, grow, and scale up in the UK. This will consider and develop recommendations on issues that inhibit scale-up and growth, identified through the development

[1] https://www.gov.uk/government/publications/life-sciences-industrial-strategy

of the Vision, as well as the recommendations of the Productive Finance Working Group (which is due to report later this year) in the context of the Life Sciences industry."

3.11 Clearly a lack of suitable floorspace can significantly inhibit scale-up and growth.

Sub-Regional Policy

3.12 The Cambridgeshire and Peterborough Combined Authority (CPCA) set a target of doubling the regional economic growth (GVA) over 25 years as part of the Devolution Deal in 2017. This requires the area going beyond what it has achieved in the past (to double an economy over twenty-five years requires an average annual growth rate of 2.81%. Historically, since 1998, the local economy has only grown at around 2.5%.). Achieving this requires employment growth and more importantly productivity growth, as we are already at comparatively high levels of employment.

Cambridgeshire and Peterborough Independent Economic Review (CPIER) (2018)

3.13 CPIER emphasises the need for productivity growth in the region one of its several recommendations included ensuring that, as a nationally strategic priority, Cambridge continues to deliver for KI businesses. The cluster effect is well-evidenced in Cambridgeshire and an opportunity exists for Greater Cambridge to encourage the forces of agglomeration through promotion of sites around existing groups of same-sector companies.

3.14 The detailed evidence base created for the CPIER also shows that Cambridgeshire and Peterborough have specialisms in high-productivity, high value added, sectors. Life Sciences is one of the strategic growth areas identified in CPIER which directly contribute towards the UK's Grand Challenges and are important global growth markets.

Cambridgeshire and Peterborough Local Industrial Strategy (2019)

3.15 The Cambridgeshire and Peterborough Local Industrial Strategy sets out an industrial blueprint to deliver Cambridgeshire and Peterborough's vision of being a leading place in the world to live, learn, work, and do business. The actions in the strategy will help deliver the aims of the national Industrial Strategy and the recommendations of CPIER.

3.16 In terms of Life Sciences, the Strategy sets out a priority of expanding and building upon the clusters and networks that have enabled Cambridge to become a global leader in innovative growth and improving the long-term capacity for growth in Greater Cambridge by supporting the foundations of productivity.

3.17 The Strategy states, at page 9, that;

"Greater Cambridge is a global centre of life sciences that will increasingly grow across Huntingdonshire and be connected to a wider cluster operating across the Arc. As part of the Life Sciences Sector Deal, local partners in Cambridgeshire and Peterborough will continue to deepen the connectivity between research and industry, with a specific focus on addressing the Ageing Society Grand Challenge."

Life Science Strategy for the Cambridgeshire and Peterborough Combined Authority (2021)

3.18 This Life Science Strategy for the Cambridgeshire and Peterborough Combined Authority highlights just how fundamental the sector is to the local economy. On page 41 it states that;

"Between these nine science parks, the Combined Authority is home to the most mature property infrastructure for life sciences firms in Europe. However, vacancy rates are running at just a few percent and we heard repeatedly during our interviews that there is an acute shortage of space for start-up and scale-up firms."

3.19 On page 53 the Strategy sets out its recommendations, including;

"immediate need for space to accommodate start-up companies. These are well catered for at Babraham campus, but there is currently no more space to accommodate them on site. The building of incubator facilities for start-up companies is less commercially viable than for more established businesses. Without space to accommodate start-ups it is likely that their creation could be slowed, they could end up in sub-optimal locations or be forced to move out of the area completely.

Consequently, consideration should be given to supporting the development of further start-up facilities."

4.0 The Green Belt

4.1 Paragraph 140 of the NPPF states that, once established, Green Belt boundaries should only be altered where "*exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans".*

4.2 The NPPF continues, at paragraph 141, in stating that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to:

"demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

Examination of other reasonable options

4.3 The councils have fully examined all other reasonable options for meeting its identified development needs in developing the First Proposals. This began with identifying and testing 6 spatial options in the First Conversation consultation (issues and options) including undertaking a Sustainability Appraisal and 24 strategy options in the interim evidence published in November 2020, including a further Sustainability Appraisal. The First Proposals consultation is also accompanied by a Sustainability Appraisal.

4.4 Furthermore, in the case of Land at Babraham Research Campus and the identified need for additional research and development floorspace, there are limited reasonable alternatives for start-ups in the biotech sector in Greater Cambridge, or indeed the UK. The issues are set out in the Socio-economic Assessment (**Appendix 3**) but summarised below and grouped into the three 'Cs':

- **Commerciality**: supporting start-up businesses, which often only want small areas of floorspace on short term leases, are a high risk prospect for science park owners compared to larger and more established businesses. However, these start-ups are exactly the types of business that the BRC caters for.
- **Cost**: many of the start-ups need access to expensive, and often unaffordable, scientific equipment and capability to undertake their research. For others, this equipment enables them to progress their research at a faster rate. There is no incentive for commercial science park operators to provide these communally, while these are central to the BRC offer.

- **Collaboration**: the clustering of such a high proportion of the scientists working in the field of biotech R&D in a single location means that formal and informal collaboration can happen easily, creating new avenues of inquiry and improving scientific outcomes. This is the predominant objective of the BRC, which cannot happen at other science parks where the biotech R&D community is substantially smaller and dispersed amongst other disciplines

Demonstrating Exceptional Circumstances

4.5 There is no formal definition of what constitutes exceptional circumstances or a standard set of criteria; it is for the local planning authority to determine whether it considers exceptional circumstances exist to justify removing land from the Green Belt and to make that recommendation to the Planning Inspectorate.

4.6 The Councils have considered sites on the edge of Cambridge in the Green Belt individually to assess whether there could be any site specific exceptional circumstances that could justify release of land from the Green Belt.

4.7 The site specific exceptional circumstances related to Babraham Research Campus are set out in the Councils Development Strategy Topic Paper. The case of *Calverton Parish Council v Greater Nottingham Councils [2015]* EWHC 1078 is referred to as providing the basis for the Councils assessment of exceptional circumstances, including the following points:

(1)The acuteness/intensity of the objectively assessed need (matters of degree may be important);

(2) The inherent constraints on supply/availability of land prima facie suitable for sustainable development;

(3) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;

(4) The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed): and

(5) The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

4.8 The Council's assessment of exceptional circumstances related to Babraham Research Campus are set out below:

Table 4.1 : Council's consideration of exceptional circumstances related to BRC

CONSIDERATION	DETAILS
Level of need and Constraints on land supply	Following completion of the development permitted in 2014 there is no further development of the campus with planning permission. The Greater Cambridge Employment Land and Economic Development Evidence Study (2020) indicates a strong supply of land for employment, including research and development. There is existing land supply at locations including West Cambridge, North East Cambridge, Granta Park, and significant new development planned at Hinxton Genome Campus. However, it also identifies that there is some additional need for land for research and development.
The consequent difficulties in achieving sustainable development without impinging on the Green Belt.	The Campus has a distinct and unique set of characteristics, not available anywhere else at other research facilities in the sub-region, and has benefited from significant public investment. The campus is important to the development of UK life sciences, in particular supporting start-up and scale-up bioscience companies. Whilst it would be possible to identify sites elsewhere outside the Green Belt, the opportunities provided by the Campus would not be supported. The Campus has been subject to significant public investment and plays a key role in the life sciences sector
The nature and extent of the harm to the Green Belt	The Greater Cambridge Green Belt Study (2021) identifies that the contribution to Green Belt purposes of this Campus site is relatively limited, and the harm resulting from its release would be low.
Extent to which Green Belt harm can be mitigated	The Cambridge Green Belt Study (2021) states that harm could potentially be reduced by the enhancement of existing hedgerows and woodland that forms the boundaries of the parcel, particularly to the east and west. This would also help ensure that development enhances existing landscape features, including parkland features, and is in keeping with the wider wooded character, in accordance with landscape guidelines set out in the Greater Cambridge Landscape Character Assessment (December 2020). NPPF paragraph 138 requires that when releasing land from the Green Belt plans should also set out ways in which the

	impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The wider Campus provides opportunities for Green Belt enhancement.

4.9 In addition to the above, the following exceptional circumstances should be noted;

Level of need and Constraints on land supply

4.10 It is worth noting that Babraham Research Campus is operating with either no or virtually no void. Furthermore, whilst the Councils refer to existing land supply at locations including West Cambridge, North East Cambridge, Granta Park and Hinxton Genome Campus, these will either provide no or limited space for start-up/growing bioscience companies.

The Exceptional Nature of Babraham Research Campus

4.11 There is nowhere else in the UK that provides such good prospects for start-up biotech businesses and therefore there is a real likelihood that without the expansion of the BRC these businesses would be lost abroad. Evidence shows that the Campus already plays a pivotal role in the Cambridge life science ecosystem and this is helping to create new products, therapeutics, jobs and growth, and facilitating more reliable company scale-up thereby maximising the impact of UK bioscience[2].

4.12 To compound matters further, there are few locations in Europe that compare well to the BRC, which means that these businesses would likely be lost to the US or emerging economies in the east, severely limiting the opportunities for any future collaboration.

Supporting the medium and long terms needs of existing businesses in the Life Science sector

4.13 Expansion of the Babraham Research Campus has the potential to support the medium and long term needs of existing businesses at the Campus and the region who are looking for appropriate opportunities to expand or relocate.

4.14 The Socio-Economic Assessment prepared by Bidwells LLP (**Appendix 3**) provides a detailed account of the growth of the Campus and need for additional floorspace. It confirms that a considerable amount of interest has been recorded by BRC Ltd by both existing tenants wanting more space and others wanting to relocate to the BRC. In total, there are twelve existing tenants who wish to increase their floorspace. Most need this space in 2021 while others have suggested it would be needed in 2022 or 2023. These tenants would still be defined as Scale-Up and therefore may not be ready for larger, unsupported premises elsewhere.

[2] https://babraham.com/babraham-ecosystem/campus-impact-report/

4.15 In addition, there have been nine enquiries so far in 2021 from businesses wishing to relocate to the BRC.

Contribution to the aspirations of the Government's Life Sciences Industrial Strategy, the CPIER, the Cambridgeshire and Peterborough Local Industrial Strategy and Life Science Strategy for the Cambridgeshire and Peterborough Combined Authority

4.16 The Babraham Research Campus plays a pivotal role in the Cambridge life science ecosystem in alignment with the Government's Life Sciences Industrial Strategy and various sub-regional strategies by providing a distinct co-location of academic research and commercial bioscience enterprises. This enables companies to scale-up, grow and be retained in the UK.

Supporting strategic transport and social infrastructure investment within the A1307 Cambridge to Haverhill Transport Corridor

4.17 There are a number of infrastructure improvement projects planned and proposed with significant benefits for the A1307 Cambridge to Haverhill Transport Corridor. This will raise the profile of the corridor as a location for investment and support the objectives for growth in the Cambridge Southern Research Cluster. These include:

- CSET Scheme Phase 1 – a series of on-route improvements along the A1307 between Cambridge and Haverhill
- CSET Scheme Phase 2 - a new public transport route from the A11 via Sawston and Shelford to the Cambridge Biomedical Campus

4.18 Transport and social infrastructure investment for further improvement projects within the A1307 Cambridge to Haverhill Corridor are likely to be secured from a range of sources given the degree of alignment with regional and sub-regional economic development strategies. The inclusion of Babraham Research Campus as a strategic employment allocation in the Corridor would greatly assist in securing any necessary funding for these projects.

5.0 Response to Policy S/BRC : Babraham Research Campus

Policy S/BRC : Babraham Research Campus

5.1 The identification of Land at Babraham Research Campus to be allocated as a proposed Policy Area for employment development, comprising the existing built area of the Campus and further areas adjoining the existing built area of the Campus, and the release of land within the Policy Area from the Green Belt is **supported.**

5.2 The identification for expansion of the Campus, comprising redevelopment of existing areas of the Campus and development of land adjoining the Campus is also **supported.**

5.3 The Council's Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020) provides a detailed understanding of potential future employment change for all jobs in the area, including exploring the key sectors that drive employment growth in the Greater Cambridge area.

5.4 The Study confirms that Life Science cluster in Greater Cambridge continues to grow with a need for additional research and development laboratory space identified. Businesses are looking for flexible workspace where new and growing businesses can locate and, with time, expand. Life science companies tend to prefer to cluster together and close to research institutes and, in some cases clinical medicine, in order to benefit from the exchange of ideas, information, resources.

5.5 Appendix H of the Councils Employment Land and Economic Development Evidence Study provides a summary of land availability in Greater Cambridge. The Babraham Institute (the historical name for the Campus) is included under site reference 45 and the summary notes that "*intensification opportunities are limited given greenbelt sensitivities".* The Policy Recommendation within the summary is subsequently confirmed as "*the site should be considered for employment designation".*

5.6 This growing need for additional research and development laboratory space is further evidenced by the Socio-Economic Assessment undertaken by Bidwells LLP on behalf of BRC Ltd (**Appendix 3**). This confirms that the Babraham Research Campus continues to be hugely successful and has seen rapid growth over the last five years, with a considerable amount of interest recorded by BRC Ltd by both existing tenants wanting more space and others wanting to be relocated to the Campus.

5.7 As a distinct co-location of academic research and commercial bioscience enterprise, the Campus has been highly successful in attracting companies to the site and is driving investment in the Cambridge Southern Research Cluster.

5.8 In practice, these distinct set of characteristics are not available anywhere else in the sub-region, or indeed the UK. The key point of difference when compared to other science and R&D centres in the country is the support infrastructure offered to start-ups, which gives the Campus its unique role within the life science research and development ecosystem.

5.9 The existing Campus is fully occupied and continues to experience high demand for space from both existing and prospective occupiers, with demand significantly outstripping supply. The Campus is operating with either no or virtually no void

5.10 The rapid success of the Campus has now stalled and this has become a significant barrier to growth. Therefore, a key priority for the Campus is to enhance support to enable companies to continue to start-up, scale-up, grow and be retained in the UK.

5.11 For this to happen, further expansion is required, across all stages of the life science discovery and development lifecycle – from communal lab space to enable lone entrepreneurs and small ventures to test their science through to bespoke buildings to facilitate scale-up without the need to relocate. Such an approach is entirely consistent with the objectives of both national and local planning policy to support economic growth and particularly clusters of knowledge-driven, creative and high technology industries.

5.12 Specific to BRC, there is also a need for additional dedicated housing at the Campus. The BRC thrives in attracting the brightest minds in the biotech sector. Many are initially doctoral graduates of Cambridge University but originate from outside of the UK, do not have specific ties to the UK and will receive offers from across the world. If they are to be retained in the Greater Cambridge area, they need initial accommodation – a first step on the housing ladder. There is also a need for dedicated housing at the Campus for key underpinning support staff that operate the facilities at the Campus.

5.13 If this housing is not co-located with the Campus and provided only for employees at the site, those the BRC is seeking to attract will need to compete with the rest of the housing market. While the Greater Cambridge Local Plan will facilitate higher rates of housing delivery, it will be sometime before this has a meaningful effect on house prices and availability. The BRC needs the accommodation now otherwise the rapid growth of the Campus seen in recent years is likely to stall. Co-locating housing with the employment will also reduce the need for staff and visitors to travel to/from off-site and therefore increase the internalisation of movements generated by the site. This will reduce the expansion's impacts on transport infrastructure and services in the wider area

5.14 In order to achieve the identified development aspirations it is appropriate to release the developed area of the Campus and adjoining land from the Green Belt. The area proposed for release from the Green Belt consists of the existing developed part of the Campus, in addition to two parcels of undeveloped land immediately to the south and north-west of buildings B940 and B950.

5.15 As referred to in Section 4, all other reasonable options for meeting the identified development needs have been explored and exceptional circumstances have been demonstrated to justify the release of land from the Green Belt.

Boundary of proposed Policy Area

5.16 The boundary of the proposed Policy Area is broadly supported but it needs to exclude the Church and Church Lane as that falls outside of the Campus estate.

Proposed Policy Direction

Remove the developed area of the Campus from the Green Belt.

5.17 The removal of the developed area of the Campus from the Green Belt is **supported.**

5.18 A Cambridge Green Belt Study (2021) has been prepared in support of the First Proposals consultation. The focus of the Study is to identify the contribution the Green Belt land makes to the Cambridge Green Belt purposes and the harm that is likely to result from expanding existing inset settlements (or settlements bordering the Green Belt's outer edge).

5.19 The purposes of the Cambridge Green Belt are set out in Policy S/4 of the adopted South Cambridgeshire Local Plan, namely to:

- *Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
- *Maintain and enhance the quality of its setting; and*
- *Prevent communities in the environs of Cambridge from merging into one another and with the city*.

5.20 The developed area of the Campus is identified within the Study as falling within Parcel BA2. The Study concludes that the parcel has 'low harm' if released from the Green Belt. The parcel scored Limited/No Contribution to the first Purpose of the Cambridge Green Belt and Relatively Limited to the remaining two.

5.21 A Landscape and Visual Appraisal (LVA) and Green Belt Study has also been prepared by Bidwells LLP (**Appendix 4**) in support of these representations. The Green Belt Study assesses the impact of the proposed Campus expansion on the qualities of the Green Belt and makes recommendations about the appropriateness of removing the site from the Green Belt together with recommendations to inform the ongoing refinement of the design proposals.

5.22 The Site is largely well screened by the existing vegetation; the woodland density would also filter views during winter months. Furthermore, the proposed siting of the buildings preserves a compact built form, avoiding inappropriate sprawl. However, it is acknowledged that the proposed buildings will be visible in some views from Bridleway 12/12 close to the Campus. As seen from this location, the proposed development would reduce the gap between the existing buildings, resulting in some loss of a sense of openness within the Campus.

5.23 The Bidwells Green Belt Study concludes, in alignment with the Cambridge Green Belt Study (2021), that the proposed Campus expansion would result in a low level of harm. The analysis of visual and landscape aspects of the effects on the Green Belt found that the overall qualities and openness of the Cambridge Green Belt would be preserved, and the proposal will not cause harm. Where adverse effects are identified, these are limited to a very local scale (i.e. the Campus and its immediate context) and a restricted group of receptors (i.e. users of the Campus and nearby PRoWs).

Remove from the Green Belt and allocate an additional area for employment development (research and development) of 17.1 hectares within and adjoining the existing built area of the campus

5.24 The removal of the built area of the Campus and land adjoining the existing built area of the Campus from the Green Belt is **supported.**

5.25 It is not clear how the Council's have calculated 17.1 hectares and BRC Ltd would welcome a discussion to clarify this. At this stage, the additional employment land (research and development) proposed to be delivered as part of the Campus expansion, through both redevelopment of the existing built area of the Campus and on land adjoining the Campus equates to 9.4 hectares (and circa 28,870 sqm of floorspace).

Identify the whole site release from the Green Belt as a Policy Area, requiring any proposals to:

- Restrict development to research and development (use class (E(g)(ii) Research and development of products or processes) and appropriate supporting ancillary uses and infrastructure.

5.26 This is **Supported.**

- Protect and enhance the landscaped setting of the site

5.27 BRC Ltd are committed to sustaining and improving the landscaped setting of the Campus.

5.28 An ecology and landscape-led approach has been taken within the emerging Campus expansion masterplan with health and wellbeing also playing an important role within the design process. The masterplan responds to the existing strong landscape structure and important ecological features found within the Campus and wider area.

5.29 The masterplan also illustrates the diverse landscape typologies proposed within the vision, enhances screening to the existing and proposed built form and incorporates biodiversity enhancements. The strategy is to deliver at least 20% Biodiversity Net Gain.

5.30 The emerging illustrative masterplan for the Campus has also been informed by a Landscape and Visual Appraisal of the site (**Appendix 4**). This concluded that the proposal would not result in adverse visual effects on the overall openness of the Green Belt and there would be no adverse effects on the wider qualities of the Cambridge Green Belt, as the proposal would not alter the existing landscape character.

5.31 Notwithstanding this, the following design principles are recommended to be applied to future detailing of the Campus expansion in order to protect and enhance the landscaped setting of the site;

- Dense planting around built development to the west and north-west in order to mitigate visual effects experienced by receptors on the bridleway 12/12, road users on Babraham Road and residents at the edge of Sawston;
- Larger tree specimens to the north of the proposal to filter possible glimpses of the proposed built form and flues in views from the Roman Road recreational footpath (E2 European Long Distance Route);
- Retention of open, grassland landscape to the west of the Site to preserve the river landscape character and retain the capacity to improve and support the River Granta GI corridor;
- Internal green gaps between the existing and proposed built form to retain some local sense of openness.

5.32 It is noted that the mitigation of visual effects would be reliant on the successful establishment of proposed planting. Therefore, appropriate landscape maintenance plans can also be prepared to ensure the planting will thrive and grow successfully.

– <u>Preserve the appearance of the conservation areas, and the setting of the Grade II Listed Babraham Hall and the Grade I Listed St Peters Church.</u>

5.33 An initial Built Heritage Appraisal has been prepared by Bidwells LLP in support of these representations (**Appendix 5**). The Appraisal identifies the heritage assets which may be affected by the proposed allocation with reference to Section 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF) where the impact of development on built heritage assets or their settings is being considered (Paragraphs 194-207).

5.34 The Appraisal also includes a site sensitivity plan, relating to built heritage only, which has been used to guide the potential approach to the location of development zones and inform the emerging illustrative masterplan for the Campus expansion. This takes into account the significance and setting of the identified built heritage assets as well as views in, out and across them.

5.35 The Appraisal concludes with an assessment of the initial impacts in terms of built heritage in the context of the emerging illustrative masterplan. This concludes the following:

- **Key views to, from and across Babraham Hall are maintained**. It is noted that some of the proposed developments are likely to be seen in the context of the Hall and as such, their detailed design, scale and massing will have to be carefully considered moving forward. This is also the case for the sited which are in proximity to the Parish Church of St Peter and the Babraham Conservation Area.
- **A significant landscape is retained around the site maintaining a clear sense of the open and green landscape setting it currently holds**. As such, the historic functional and visual contribution the site makes to the setting of the listed buildings within the site and the Conservation Area (and the assets this holds) is maintained. This also ensures a retained connectivity between the assets and the wider countryside which contributes to their wider setting, context and understanding.

- **Additional woodland, individual trees, copses planting, scrub planting, orchard and grassland planting are all proposed to strengthen the biodiversity of the site and enhance its green character**. This is further reinforced with the addition of a proposed wetland and restored pond.
- **Where areas of additional built form are proposed, the placement and location of these have been carefully considered**. As shown on the illustrative masterplan, these are limited to areas which are either already developed or within areas that are in close proximity to developed areas. This creates a clear grouping to the built form within the site, providing a clear understanding of the evolution of it and allows for its continued growth to be achieved in a manner which respects the heritage and landscape setting in which the site is located.

5.36 The Appraisal concludes that, at this early stage, if masterplanning is further developed to ensure impacts on built heritage assets are mitigated or removed altogether these impacts are likely to be at the level of "less than substantial" harm in terms of the policies of the NPPF – although it is not possible to define any more precisely the levels of impact at this stage until more detail is available.

– Protect and enhance the corridor of the River Granta (recognised as a county wildlife site)

5.37 BRC Ltd are committed to protecting and enhancing the corridor of the River Granta.

5.38 A priority for BRC's approach to nature is, in the first instance, retaining the existing ecological value such as the flood plain which provides flood alleviation and locks up carbon. Overall, Campus expansion will enhance ecological value by delivering at least a 20% biodiversity net gain (BNG) in line with Natural Cambridgeshire's Vision of doubling the nature conservation value of the area by 2050. This will consist of wider enhancements to the campus, including improvements to the river systems.

5.39 The biodiversity enhancements proposed specific to the corridor of the River Granta include:

- Restoring minor watercourses to a more meandering profile; reduce bankside gradient to a shallow cross-sectional profile and remove overhanging/shading trees;
- Allowing the river to overflow into low lying areas of chalk scrapes;
- River enhancement works including creation of riffles, bed-raising, localised regrading of banks to a more shallow profile, adaptation or removal of weir to enable fish passage and sensitive management of riverside trees and shrubs (in liaison with Wild Trout Trust).

5.40 Further detail on biodiversity enhancements are provided in the Preliminary Ecological Appraisal prepared by The Landscape Partnership which accompany these representations (**Appendix 7**).

- Take steps to include sustainable travel opportunities, including the opportunities provided by the planned Cambridge South East Transport Scheme (CSET).

5.41 A Transport Strategic Overview and Access and Movement Strategy has been prepared by Stantec and accompanies these representations (**Appendix 8**).

5.42 The Strategy sets out the access and movement ambition and commitments for BRC and has been used to inform the emerging Illustrative Masterplan for the campus expansion. BRC's strategy is based on a sustainable expansion that integrates with existing and committed walking, cycling and public transport networks, such as the CSET scheme, so that the expansion has excellent connectivity with surrounding areas by these modes, as well as continued permeability through the Campus site.

5.43 The Strategy embraces a change in focus away from "highways" to a much more holistic "transport" approach, where mobility is provided by sustainable travel modes. This will ensure that the expansion of the Campus meets employees' needs to travel to work by a choice of sustainable travel modes, along with promoting healthy lifestyles and delivering a sustainable, vibrant, and socially inclusive workplace. The key elements of the Strategy are summarised below;

Reducing the Need to Travel by Car and Build in Healthy Lifestyles

- The expansion in R&D facilities will be combined with additional on-site residential dwellings, for campus staff key workers, visiting scientists and PhD students at the Campus, which will reduce the need for staff and visitors to travel to/from off-site and therefore increase the internalisation of movements generated by the site. This will reduce the expansion's impacts on transport infrastructure and services in the wider area;
- The expansion will include a comprehensive network of foot and cycle paths to provide safe, logical, convenient, and attractive links internally to the existing Campus's R&D facilities, facilities and also residential dwellings;
- The existing and proposed expansion's internal layout will create a high-quality development, engendering the feeling of a sense of 'place' in which staff and visitors experience pleasant landscaping, outdoor social areas and 'shared accesses' not 'roads' within the site. This will help with the vision of creating a healthy, socially inclusive, and well-connected campus.

Maximising Opportunities for New Types of Mobility

- New technologies, changing travel patterns and the focus on zero carbon will play a pivotal role in how we plan new developments. The transport strategy and planning for the campus expansion will need to be flexible and resilient so that it is responsive to these changes in order to maximise the resulting opportunities for new types of mobility. One example is that the developing masterplan includes for EV Charging bays and the ducting infrastructure to potentially connect more bays with a charging point in the longer term future to meet demand.

Prioritising Walking and Cycling for Local Trips

- The campus expansion will provide high quality walking and cycling connections to the surrounding countryside and committed sustainable infrastructure, including the Linton Greenway, and the numerous footpaths and bridleway surrounding the campus.
- Walking and cycling will be encouraged as part of a Travel Plan that will be prepared for the expansion and this Travel Plan will build on the existing successful Campus Travel Plan.

Maximising the Use of Public Transport

- As part of the expansion, Babraham Research Campus will work with the Greater Cambridge Partnership (GCP) to develop a public transport strategy that makes full use of the committed Cambridge South East Transport Scheme (CSET) public transport strategy and infrastructure. This could include new and / or extensions of the CSET committed bus services into the site;
- To maximise the use of public transport, the strategy for the campus expansion will include proactive encouragement to staff and visitors to use these improved bus services. This would be part of the continued updates to the existing Campus Travel Plan;
- Internal footways and cycleways will be connected up to the existing bus services operating along the A1307 that have and will continue to be improved as part of CSET Phase 1. They will also connect to the future committed public transport route that will run south of the site as part of CSET Phase 2.

Private Car Strategy

- The existing onsite theme of prioritising cyclists and pedestrians over motorised vehicles will be continued for each development zone, with cycle parking located close to main building entrances and linked to appropriate desire lines. The existing arrangement to direct all motorised employment traffic through the A1307 access roundabout will be continued to limit impact on the adjacent Babraham Village;
- Car parking provision will be balanced at a level which recognises likely demand, but also seeks to deter habitual car use for journeys that could be made by non-car modes. To meet this balance the existing campus parking/ floor area ratio will be continued into the expansion, or reduced, to allow levels much lower than current / future maximum local policy ratios;
- Car club spaces should also be provided as part of the expansion, so that staff can have access to a car but do not need to own one;

5.44 As referred to above, the Greater Cambridge Partnership (GCP) are planning transport improvements along the A1307 corridor between Cambridge and Haverhill as part of the Cambridge South East Transport (CSET) scheme. These commitments provide a significant opportunity to align and support the Campus plans for expansion. The transport improvement measures will help to ensure that the expansion is deliverable and accords with national and local transport policy guidance.

5.45 Phase 1 includes for the Linton Greenway, part of which runs through the Babraham Research Campus along the north-eastern boundary and provides a high quality, segregated connection for pedestrians and cyclists between Linton and Cambridge. It includes a new Toucan crossing of the A1307 immediately southeast of the site access roundabout, and a new shared footway / cycleway running northwest of the site access roundabout towards Cambridge. The crossing allows a safe crossing of the A1307 for users of the bus services that stop on the A1307 for Campus users and the shared footway / cycleway aids pedestrian and cycle connection with Cambridge.

5.46 Phase 2 of CSET is a major public transport, walking and cycling infrastructure scheme. It is made up of three key elements:

- A dedicated public transport link between the A11 and the Cambridge Biomedical Campus, running immediately to the south of the Babraham Research Campus, with potential connections into the Babraham Research Campus itself;

- A new Travel Hub facility near the A11/A1307 junction; and
- New cycling, walking and equestrian facilities running alongside the public transport link

5.47 A Transport and Works Act Order (TWAO) application for the scheme is planned to be submitted to the Secretary of State for Transport in Autumn 2021, with planned opening in 2025.

5.48 The CSET Phase 2 scheme will transform the accessibility of the existing Babraham Research Campus and therefore proposed expansion site by non-car modes. It will provide a high quality public transport link with Sawston, Stapleford and South Cambridge, including the proposed Cambridge South railway station at the Cambridge Biomedical Campus. The public transport services would be unaffected by congestion, enabling more reliable journey times and allowing public transport to compete more effectively with the private car.

5.49 The latest Babraham Research Campus annual travel survey asked the question whether staff would use "*an off road public transport route as currently under review by Greater Cambridge Partnership for the A1307 South East corridor*". Of the responses, 52.1% of staff said they would use the GCP public transport scheme, which provides confidence that existing and future staff at the Campus would reduce their dependence on the private car by uptake of the CSET public transport scheme.

5.50 The Strategy concludes that there are no transport nor highways reasons why the Babraham Research Campus Expansion should not be allocated for development in the Greater Cambridge Local Plan.

- Retain the area of The Close as key worker and affordable housing to support the needs of the Campus. Any future renovation or replacement should retain the low density character, which responds to the sensitive village edge location

5.51 BRC Ltd supports the area of The Close being retained as affordable housing for key workers to support the needs of the Campus.

5.52 The Campus expansion includes for the area known as 'The Close' which currently comprises 40 houses to be retained in residential use but redeveloped to consist of up to 60 new energy efficient dwellings and 100 new student apartments to ensure BRC can accommodate existing and anticipated future housing requirements for those who have a direct link with the Campus. The redevelopment will retain a low density character and respond appropriately to its village edge location.

5.53 The incorporation of suitable housing provision responds to the critical importance to recruit and retain staff in an increasingly competitive global market. It will also enable BRC to support staff in finding accommodation and reduce travel associated with the Campus for those living within walking distance.

Other Issues and Impacts and Potential Mitigation

5.54 A suite of further technical reports and assessments have been completed to inform the emerging illustrative masterplan and support the sustainable expansion of the campus. They also

identify opportunities and constraints and outline potential mitigation measures where necessary. These are summarised under the headings below;

Enhancing Campus-Wide Biodiversity

5.55 A Preliminary Ecological Appraisal accompanies these representations (**Appendix 7**). This confirms that a biodiversity survey of the whole Campus estate, with a particular focus on the proposed future development locations, was undertaken in mid May 2021. Mapping of habitats was carried out and the resulting Phase 1 habitat map was used as the foundation for Constraints and Opportunities identification at the campus-wide scale.

5.56 The Report concludes that the overall value of the site to wildlife is considered to be Lower at the County scape. Furthermore, the report states that it is likely to be possible to deliver effective mitigation for any impacts arising from development of the proposed Campus masterplan to benefit biodiversity. Indeed, the campus masterplan is informed by the need to deliver 'Nature-based solutions' (NbS) through the development. NbS involves working with nature to address societal challenges, providing benefits for both human well-being and biodiversity.

Promoting Sustainable Growth

5.57 A Sustainability Statement has been prepared by Hoare Lea in support of these representations (**Appendix 9**). The Statement sets out the ambition and commitments for BRC and has been used to inform the emerging Illustrative Masterplan for the campus expansion. It is structured across the five capitals; physical, social, economic, natural and human, as summarised below.

Physical – Achieving net zero carbon

- *Passive design and energy efficiency* - New buildings would be facilitated to reduce demand for energy as far as possible;
- *All electric servicing strategy* - The emerging strategy proposes all homes and buildings utilise electric heat pumps, which allows the generation of heating, hot water, and cooling (where required) at very high efficiencies of 250% or more;
- *Renewable generation* - Efficient electric systems will be complemented by renewable energy generating technologies such as solar PV on available roof space. In addition, solar installation is being explored in the Renewable Energy and Support Infrastructure zone south of the River Granta, with the potential to supply significant quantities of zero carbon electricity to homes and buildings within the Campus;
- *Pathway to net zero carbon buildings* - The Campus has a target of net zero by 2040 in line with the UK's obligations to decarbonise;
- *Connectivity* - BRC will continue to encourage a shift to sustainable modes through local solutions, including the opportunities provided by the planned Cambridge South East Transport Scheme (CSET);
- *Electric Vehicle Charging* - the developing masterplan includes for EV Charging bays and the ducting infrastructure to potentially connect more bays with a charging point in the longer term future to meet demand;
- *Digitally enhanced lives* – the developing masterplan will ensure modern digital infrastructure is provided;

- *Optimising performance* - Post Occupancy Evaluation will continue to be undertaken to ensure that new buildings are operating as per the design intent and in line with visitor and occupant expectations. In addition, the intention is to incorporate automated meter reading systems in buildings to understand energy use and patterns at a granular detail.

Social – Creating vibrant communities

- *Accelerating knowledge and creativity*
  - The proposed new office and laboratory buildings will be designed flexibly so that they can be adapted to facilitate the rapid growth of companies and smaller space requirements of start-ups and scale-ups, as required;
  - To support informal encounters and work environments, the Campus masterplan will also explore the incorporation of outdoor office space as part of the public realm which can be landscaped more creatively to accommodate collaborative workspaces;
- *Inclusive placemaking*
  - The introduction of new key worker and affordable housing, built to Cambridge healthy homes standard and resilient to climate change, will contribute to the creation of a healthier, more sociable and interconnected local ecosystem integrated through work connections;
  - New open space will be provided on-site to meet the needs of residents, particularly children and teenagers, as well as workers addressing local deficits;
  - The Campus masterplan will be designed to provide employees with a range of opportunities appropriate to the working day for social interaction and engagement with the campus and wider community. For example, a new shop is proposed and more childcare capacity for employees at the popular onsite nursery is likely to be available in the future given the place allocation policies which favour BRC workers;
  - BRC will seek to activate public spaces with events and activities (arts and culture, nature, play, education, etc) whilst also enabling organic temporary and meanwhile uses to constantly evolve in response to demand. Outdoor spaces will also be provided for companies to hold ad hoc events on site as a team building exercise
- *Empowered local voice*
  - BRC intend to continue with engagement with tenants and the wider community as the Campus masterplan develops. Forms of engagement can include for volunteering and continuing the tradition of giving site tours and reaching out to local schools to support STEM outreach activities

Economic – Pursuing inclusive prosperity

- *Circular Economy* – the Campus will continue to apply the principles of circular economy to the developing masterplan. This will include maximising the proportion of reused and recycled materials used in construction and minimising the amount of waste sent to landfill;
- *Construction* – as referred to in the supporting Socio-Economic Assessment, the campus expansion has the potential to support 1,400 jobs and £50.7m in GVA to the national economy;
- *Stewardship* – BRC will continue to involve direct employment in the facilities, estates security, and management teams along with promoting the employment of people locally, at all levels, including apprentice and placements. Any training opportunities created during expansion will continue to be advertised locally, contributing to upskilling the community;

- *Life Science* – The additional research and development buildings at the Campus will host early stage and growing bioscience companies and will leverage the co-location with the Babraham Institute to further enhance the community of like-minded businesses. This ecosystem facilitates the commercialisation of scientific research, allowing company growth, innovation and investment, to bolster Cambridgeshire's world leading life science cluster.

Human – Enabling personal empowerment

- *Healthy Buildings*
  - Best practice dust suppression measures would be explored during the construction phase to minimise detrimental impacts on construction workers and local residents and tenants;
  - Zero emission heating systems during operation, encouraging a shift to active modes of travel, and facilitating a transition to electric vehicles all form part of the emerging strategy to be taken forward;
  - Good indoor air quality will be achieved by specifying low VOC level products for interior finishes;
  - Local microclimate, including wind, solar radiation, noise, and local thermal comfort will be considered when designing key areas of public realm.
- *Fitness and Wellbeing*
  - By encouraging people to walk and cycle, the local population will continue to be facilitated to be physically active;
  - the design of buildings with space uses where daylight access is deemed beneficial would seek to achieve good practice daylight levels whilst also considering the impacts of excessive daylight exposure i.e. glare.;
  - the Campus masterplan will retain and enhance the existing network of high quality, permeable, well connected and accessible green spaces for the benefit of both the local community and wildlife;
  - As set out under social capital, communal work areas, open space, and informal 'corridor conversations' allow chance discussions between those who work at BRC. More formal events also bring people together on Campus and with the wider community.

Natural – Achieving an environmental net gain

- *Biodiversity Net Gain* – the Campus expansion will enhance ecological value by delivering at least a 20% biodiversity net gain (BNG) in line with Natural Cambridgeshire's Vision of doubling the nature conservation value of the area by 2050;
- *Natural Capital*
  - flood risk will be mitigated through the creation of additional flood plains and flood scrapes. Further opportunities to increase water retention and encourage peat formation will also be considered. Additionally, by introducing new systems such as SuDS (Sustainable Drainage Systems), street trees, a green roof and green walls the water management capacity of the Campus could be further enhanced;
  - Green roofs, walls and street trees will also be considered on a case-by-case basis where viable to cool the building and surrounding area through shading and the process of evapotranspiration;

- Trees and woodlands created onsite will have the functional benefit of sequestering carbon, credits for this can be attained once the trees mature, this could form part of a long-term carbon management strategy;
- The green space south of the river is publicly accessible to maximise benefits to mental and physical wellbeing. These benefits could be elevated by integrating edible plants which would allow the building users to directly interact with the natural space;
- To help alleviate future water scarcity the masterplan will adopt water usage reduction design into all new and where possible existing buildings. Rain water harvesting will also be implemented where possible to reduce the demand of potable water
- Ensure all new buildings are designed and constructed using BREEAM accreditation standards

The River Granta and Flood Management

5.58 Babraham Research Campus is largely located in Flood Zone 1 which is a low chance of flooding. The River Granta runs within the site and the land immediately bordering the river encroaches into Flood Zone 2.

5.59 Whilst there is a low chance of flooding, it is planed is to mitigate flood risk through the creation of additional flood plains and flood scrapes. Further opportunities include restoring the minor watercourses to a more meandering profile; reinstating shallow foot-drains; restoring lost ponds; and re-wetting the grazing marsh. These approaches would increase water retention and encourage peat formation which can act as a carbon store.

5.60 Additionally, by introducing new systems such as SuDS (Sustainable Drainage Systems), street trees, a green roof and green walls the water management capacity of the site could be further enhanced. SuDS enabled street trees could manage rainwater flow around access roads, car parks and walkways. Where deemed technically and financially feasible, onsite water management could be further supported through a chalk grassland roof, which could collect and store rainwater. The collected water could then be used for non-potable purposes such as toilets and irrigation. BRC have already incorporated rainwater harvesting on three buildings for use in landscape irrigation.

Preserving Archaeological Interest

5.61 An Archaeological Assessment has been prepared by Cambridge Archaeological Unit (CAU) in support of these representations (**Appendix 7**). The Assessment summarises the known archaeology within the Campus and establishes its likely archaeological potential in accordance with the requirements of the National Planning Policy Framework (NPPF) and Local Planning Policy. In addition, it identifies and assesses the constraints and opportunities posed by the archaeology and suggests responses to the proposed Campus expansion proposals.

5.62 All the archaeological remains reported at the Campus are ‘undesignated heritage assets’ in the meaning of the NPPF. Based on the extensive archaeological investigations carried out on the site, there are unlikely to be further assets of substantially higher significance than those already found and excavated.

5.63 The main potential impact of development within the BRC lies primarily within the footprint of proposed new buildings along with any buried services. Decisions about treatment of archaeological remains – whether to preserve in situ or mitigate ahead of development – are the responsibility of the Cambridgeshire Historic Environment Team (CHET) acting as archaeological advisors to the Local Planning Authority, the South Cambridgeshire District Council. However, based on the present assessment of archaeological potential and CHET's past approaches to the archaeology within the BRC, there is no expectation that any future finds would have a significance which would warrant their preservation in situ or constrain potential future allocation and development of the Campus.

The Public Benefits

5.64 The identification of Babraham Research Campus as a Policy Area in the emerging Greater Cambridge Local Plan, including for its expansion, would provide significant economic, social and environmental benefits:

- Subject to its release from the Green Belt, the site has **no insurmountable technical constraints** that would preclude the development of further employment land and supporting Campus-linked housing as part of a planned expansion of the Campus;
- **Delivering the objectives of the Government's objectives to grow the UK's Life Science capabilities** by focussing economic growth within the core of the Cambridge Southern Research cluster;
- Provision of **circa 28,870 sqm of net additional research and development floorspace** within an exemplary working science community which in turn would **support approximately 1,400 jobs and £50.7m in GVA to the national economy.** Lending critical mass to the Campus would also create more opportunities for interactions and collaboration to support innovation;
- **Further employment opportunities through the provision of expanded on-site facilities and amenities to meet the needs of the Campus and through the construction process and increase in business rates**;
- Provision of **120 net additional Campus linked houses**;
- Provision of **new and enhanced nursey and retail provision**, including for a new community meeting point and a new local play area;
- Retention of **circa 3.5 hectares of amenity land**, for the use of the Campus and the local community;

  A new **community orchard** and **'Common' area** within the south of the Campus, adjacent to the community planting area (Forest Garden), local school and cricket pitch;
- The site's location within the A1307 Strategic Transport Corridor between Cambridge and Haverhill enables the site to **support potential transport improvements in the corridor,** such as the Cambridge South East Transport scheme (CSET);
- New and enhanced opportunities for informal recreation to promote health and wellbeing;
- An embedded **Net Zero Carbon** strategy from the outset to ensure a positive, local response to climate change;
- **A development capable of securing at least 20% Biodiversity Net Gain** as a result of the extensive network of retained and proposed green spaces providing opportunities for an increase in natural habitat and ecological features;

- Enriching landscape and providing an array of new publicly accessible green open spaces;
- Mitigating and enhancing flood risk through the creation of additional flood plains and flood scrapes; and
- **A development capable of providing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land and to define new robust Green Belt boundaries**.

6.0 Response to Policy S/DS : Development Strategy

6.1 Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge. It will set out where new jobs and homes should be provided in order to meet the vision and aims of the Local Plan.

6.2 The Development Strategy proposes some development in the rural area south of Cambridge, the Rural Southern Cluster, where homes and jobs can be located close to each other and served by good quality public transport, cycling and walking links, including additional employment at Babraham Research Campus, through releasing the Campus and an area of additional land from the Green Belt.

6.3 Additional employment space at Babraham Research Campus will support the Southern Cambridge Research Cluster and ensure the Councils provide additional space for life science businesses to cluster and grow. This is in direct response to guidance contained within the NPPF regarding the need to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, create or high technology industries. The Policy also responds to the identified unmet need for additional research and development laboratory space as evidenced in the Council's Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020).

6.4 Babraham Research Campus is fully occupied and continues to experience high demand for space from both existing and prospective occupiers, with demand significantly outstripping supply. However, the rapid success of the Campus has now stalled and this has become a significant barrier to growth. Therefore, a key priority for the Campus is to enhance support to enable companies to continue to start-up, scale-up, grow and be retained in the UK.

6.5 Growth at Babraham Research Campus also has the ability to make best use of existing and committed sustainable transport infrastructure. The committed infrastructure proposals being progressed by the Greater Cambridge Partnership (GCP), notably the Cambridge South East Transport Scheme (CSET), will provide significant transport capacity to support the future expansion of Babraham Research Campus.

6.6 Policy S/DS is therefore **supported.**

7.0 Response to Policy J/NE : New employment development proposals

7.1 Policy J/NE will set out the criteria that will determine whether proposals for employment development in urban areas, villages and the countryside are acceptable.

7.2 The proposed policy direction is that employment development (Classes E(g), B2 and B8) will be supported, *inter alia,* in the countryside '*only where the expansion of existing businesses fulfils a number of criteria (described below)'.*

7.3 The supporting text to the proposed policy direction then states, on page 230, that;

'The Strategy theme of this consultation proposes a range of sites and policies which are particularly suited to supporting the needs of clusters. These include significant opportunities at:

- *North East Cambridge*
- *West Cambridge*
- *North West Cambridge*
- *Cambridge Biomedical Campus*
- *Welcome Trust Genome Campus*
- *Granta Park*
- *Babraham Research Campus*
- *New Towns at Northstowe and Waterbeach. '*

7.4 Babraham Research Campus is proposed as a Policy Area in the First Proposals consultation document, under Policy S/BRC.

7.5 Policy J/NE is broadly **supported** but future policy wording should be clearly written to confirm that employment development will be supported in defined '*Policy Areas in the countryside'.*

8.0 Summary and Conclusions

8.1 These representations on the 'First Proposals' (Regulation 18) draft of the emerging Greater Cambridge Local Plan ("Local Plan") are prepared by Bidwells LLP on behalf of Babraham Research Campus Ltd ("BRC Ltd"), who in turn represent the Campus partners (The Babraham Institute, BBSRC, and BRC Ltd). They are prepared in respect of Land at Babraham Research Campus.

8.2 The Babraham Research Campus is one of the UK's leading locations to support early-stage bioscience enterprise and is distinct in its co-location of bioscience companies with the world leading discovery research of the Babraham Institute, a world-renowned research organisation that receives strategic funding from the Biotechnology and Biological Sciences Research Council (BBSRC).

8.3 The Campus provides companies laboratory and office space, with the underpinning operational support, networking and collaboration opportunities, together with access to outstanding scientific facilities in an ideal geographical location at the core of the Cambridge Southern Research Cluster.

8.4 The First Proposals consultation document recognises the need to support the continued success of this nationally important facility. As such, the built up area of Babraham Research Campus and the land immediately adjoining it is currently identified within the consultation document, under **Policy S/BRC**, as a Policy Area and proposed for release from the Green Belt.

8.5 These representations broadly **support draft Policy S/BRC.**

8.6 The Council's Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020) confirms that the Life Science cluster in Greater Cambridge continues to grow with a need for additional research and development laboratory space identified.

8.7 Babraham Research Campus continues to be hugely successful and is experiencing high demand for space from both existing and prospective occupiers, with demand significantly outstripping supply. Furthermore, there is no reasonable alternative for start-ups in the biotech sector in Greater Cambridge, or indeed the UK

8.8 Therefore, a key priority for the Campus is to enhance support to enable companies to continue to start-up, scale-up, grow and be retained in the UK. For this to happen, further expansion is required. There is also a need for additional dedicated housing at the Campus. The BRC thrives in attracting the brightest minds in the biotech sector. Many are initially doctoral graduates of Cambridge University but originate from outside of the UK, do not have specific ties to the UK and will receive offers from across the world. If they are to be retained in the Greater Cambridge area, they need initial accommodation – a first step on the housing ladder.

8.9 In order to achieve the identified development aspirations it is appropriate to release the developed area of the Campus and adjoining land from the Green Belt. All other reasonable options for meeting the identified development needs have been explored and exceptional circumstances have been demonstrated to justify the release of land from the Green Belt.

8.10 A range of technical assessments have been prepared to identify any opportunities and constraints, make recommendations on ways in which these might be mitigated or addressed and ultimately inform an emerging illustrative masterplan for the Campus expansion. These assessments conclude that there are no 'in principle' constraints to the delivery of the expansion and that Land at Babraham Research Campus is capable of being sensitively designed so as to respond appropriately to its landscape and heritage setting.

8.11 The proposal to identify the built up area of Babraham Research Campus and the land immediately adjoining it as a Policy Area and proposed for release from the Green Belt is therefore **supported**.

8.12 BRC Ltd also broadly **support draft Policy S/DS and draft Policy J/NE.**

BIDWELLS

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