Greater Cambridge Shared Planning
Planning Policy Team
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH

BY EMAIL **13 December 2021**

Dear Sir / Madam

Representations to Greater Cambridge Local Plan Regulation 18 First Proposals
On behalf of Trinity College Cambridge and Cambridge Science Park

Thank you for the opportunity to comment on the First Proposals for the Greater Cambridge Joint Local Plan (JLP). These representations are made by DP9 and Sphere25 on behalf of Trinity College Cambridge (TCC) as the principal owner and custodian of Cambridge Science Park (CSP).

As an employment destination of local, regional, and national importance, TCC would like it on record that it has deep concerns relating to Cambridge Science Park's removal as an Employment Allocation within the JLP.

It is acknowledged that detailed comment responses are sought on specific policies or site proposals using the online consultation portal. A call for sites submission has been made via the online portal. However, to provide a deeper understanding of our concerns over the emerging JLP, this letter seeks to provide additional detail on the key issues.

In summary these are that:

- The plan is not positively prepared, ignoring one of Greater Cambridges largest employment sites.
- The emerging JLP is not in accordance with National Policy which seeks (as a minimum) to support economic growth.
- The JLP conflates the delivery of new homes reliant on the DCO with the ongoing growth of employment associated with the existing Cambridge Science Park cluster.
- Transport capacity is a key constraint to the delivery of the NECAAP and to date this issue remains unresolved.

It is difficult to comprehend how an emerging JLP that does not recognise one of Greater Cambridges largest employment sites has been positively prepared.

The exclusion of a draft allocation places an undue reliance on an emerging North-East Cambridge Area Action Plan (NECAAP) being adopted and the Development Consent Order (DCO) for the relocation of the existing Cowley Road Waste Recycling Centre being achieved. This conflates the delivery of new homes reliant on the DCO with the ongoing growth of employment associated with the existing Cambridge Science Park cluster.

Whilst TCC supports the successful conclusion of the DCO process and the broad principles of a NECAAP, it is crucial that CSP's importance is recognised in the emerging JLP.

The NECAAP has not been tested through the plan making process, the evidence base was only published part way through the consultation (and not in full), and the trajectory for the emerging NECAAP does not align with the JLP process to enable parallel consideration.

The evidence base is inconsistent and in places flawed, where CSP is recognised as a crucial element of the Greater Cambridge Economy, and yet excluded from the HELAA and ultimately inclusion within the plan.

An allocation provides the supporting policy and development management framework to recognise and harness CSP's continued evolution and regional role as a significant contributor to employment, research and development for the Cambridge and UK economy.

Cambridge Science Park - Background

With its links to the University of Cambridge, prestigious owner and 50-year track record of success, the Cambridge Science Park enjoys an enviable reputation as Europe's oldest and most successful science park.

Trinity College established the Cambridge Science Park in 1970 in response to recommendations by Harold Wilson's Labour government that UK universities should form better links with the emerging "white-hot" hi-tech industries.

In 1969 at the University of Cambridge, Cavendish Professor Sir Neville Mott and his committee produced a report recommending an expansion of science-based industry close to the city that would enable companies to collaborate with the nearby concentration of world-leading academic scientific expertise. Trinity College and its Senior Bursar, Sir John Bradfield, were impressed with this idea and began masterminding a development scheme for a plot of land to the north of the city which the College had owned since the 1500s.

Planning permission was granted one year later, and the first tenant, Laser-Scan, a spin-out from the Cavendish Laboratory, took occupation of its 10,000 sq. ft premises in 1973.

Today the Park comprises 58 buildings set in 152 acres of landscaped parkland and is home to over 130 companies employing almost 7,500 people. TCC continues today to retain the freehold of the estate and approximately 56% of the land has been let on long leases (excluding areas of public realm).

The site benefits from an existing allocation (Policy E/1).

One of CSPs key differentiators when compared to other science and technology Parks is the diversity of its occupiers in terms of sector, size, nationality and age. Diversity is important because scientific disciplines that were once separate and distinct are now converging. Rather than build in-house capabilities beyond their core area of expertise, companies are sourcing innovation from businesses with complementary competencies. Proximity to relevant scientific expertise is therefore an important factor in a company's choice of location. Increasingly, science-based companies want to be part of a dynamic, multi-sectoral "ecosystem". Cambridge Science Park offers this level of diversity and therefore provides unrivalled opportunities for companies to form cross-sector collaborations.

Figure 1: Cambridge Science Park Today, Perkins + Will 2020

Trinity College Cambridge through establishing Cambridge Science Park over 50 years ago embraced a concept that would change the hi-tech sector in Cambridge, the UK and beyond. Trinity College's commitment to science 'building a better world' by providing a world class home to research intensive companies is again at the forefront of government thinking, which recognises that innovation is key to the challenges facing the economy and in addressing climate change challenges[1].

Cambridge Science Park - Location, Scale and Role

Bizarrely, the Jobs Topic Paper[2] makes no explicit reference to Cambridge Science Park as an employment location (only passing reference to a hotel); but makes specific reference to Cambridge Biomedical Campus, Welcome Trust Genome Campus, Granta Park and Babraham Research Campus amongst many other smaller employment locations.

To provide planning officers with an understanding of the scale and role of Cambridge Science Park, a comparison is provided as Appendix 1 which shows Cambridge Science Park and a selection of sites which are given prominence through explicit reference in the local plan with their comparative size, number of employees and emerging JLP additional homes growth within 5km[3].

[1] Build Back Better: Our plan for growth, March 2021, Ten Point Plan for a Green Industrial Revolution, November 2020

[2] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/TPJobsAug21v2Nov21.pdf

[3] Cycling rates for travel to work do not decline until the trip is longer than 5km (3.1 miles), Cambridge Insight: https://cambridgeshireinsight.org.uk/wp-content/uploads/2017/08/Transport-and-Health-JSNA-2015-Active-Transport.pdf

Cambridge Science Park is comparable in size and employee figures to the four key Science Parks identified within the JLP. In fact, as stands today Cambridge Science Park is one of the largest which makes the lack of any reference in the emerging JLP questionable.

Furthermore, CSP is located within closer proximity to a higher volume of the key housing growth areas illustrated within the JLP.

Page 38 of the JLP suggests that the JLP strategy has been strongly influenced by

> *'reducing climate impacts through compact development located to connect homes and jobs where active and sustainable travel can be maximised.*

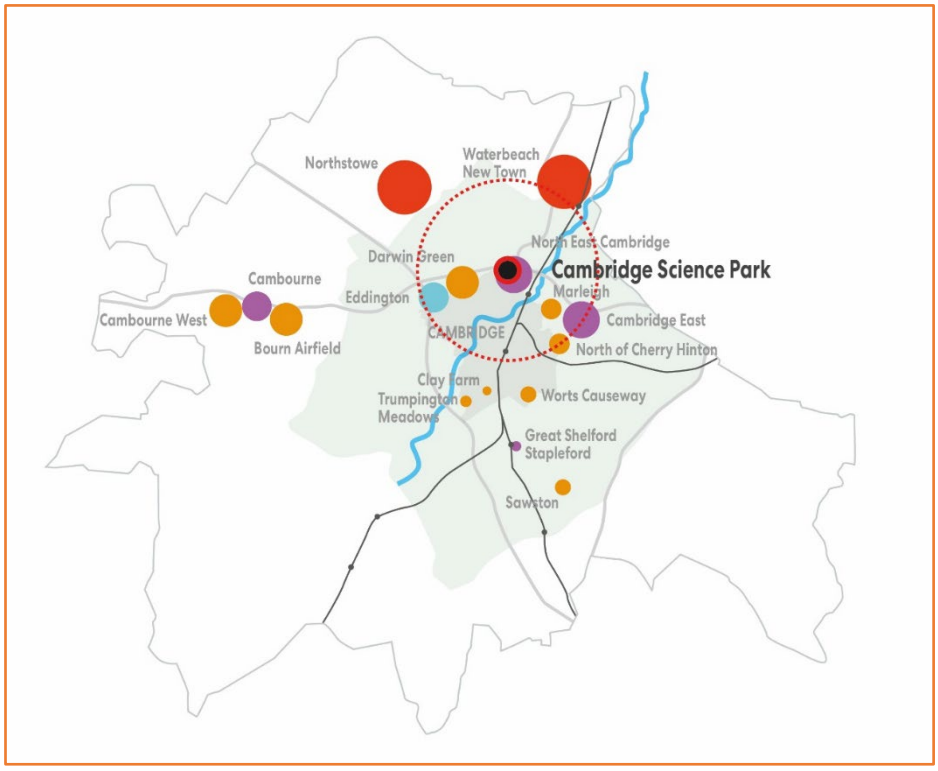


Figure 2: Cambridge Science Park with 5km radius and JLP growth locations, Perkins + Will 2021

Page 39 of the JLP goes on to state that '*We also have evidence that locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help reduce commuting and associated carbon emissions and congestion.*' It therefore logically follows that providing additional jobs close to existing and proposed homes in the north of Cambridge utilising the existing and planned sustainable transport measures would be equivalent.

North East Cambridge is identified as the most sustainable location for growth, therefore Cambridge Science Park is the most sustainable location for further employment growth within Greater Cambridge. However, this is not recognised within the emerging JLP.

As written the emerging JLP makes no attempt to support employment at CSP.

Cambridge Science Park 2050 Vision

Cambridge Science Park is currently consulting on its 2050 Vision, setting out the vision for the future development of the park[4]. Underpinned by innovation, the 2050 vision goals are to:

1) Create a place where people enjoy working.
2) Provide flexible, energy efficient properties fit for companies at all stages of growth
3) Offer an unrivalled business community
4) Help address inequality and create opportunity in the wider area
5) Be a leader in sustainability and environmental protection

Figure 3: Cambridge Science Park 2050 Vision, Perkins + Will 2020

Spatially this vision equates to approximately 4.7m sq ft of floor space, an increase from 2.3m sq ft (existing, permitted and under construction on the park today); providing up to 21,000 jobs, almost triple the current number. This vision includes over 30 acres of green space (20% of the site), an increase from the existing 27.4acres, and 50% fewer parking spaces.

The 2050 vision goes beyond the spatial development framework, building on the social value and community building that has been increased in recent years at the Science Park including the move to an open campus with programmed events for the community and fostering connections with the neighbouring Cambridge Regional College.

[4] http://rscnet.co.uk/flipbook/csp2050/#p=1

Although primarily an employment location, CSP will continue to improve its provision of a wide range of ancillary services and amenities that support employees and employers like the onsite nursery, business hub, bike shop and gym.

It is acknowledged that the 2050 vision provides a development framework for Cambridge Science Park beyond the Plan Period[5]; however, the potential for up to 21,000 jobs on brownfield land, providing an increase in green space and an increased mode share by sustainable transport should be recognised within the development strategy for Greater Cambridge.

It is disappointing that the JLP team have not engaged with the CSP team in the production of the First Approach. Indeed, for the plan to meet the tests of soundness the plan needs to have taken into account the reasonable alternatives – for this reason we are submitting the Cambridge Science Park 2050 Vision in response to the consultation and requesting that Cambridge Science Park – an existing allocation is duly considered through the call for sites.

A breakdown of the anticipated additional floorspace is included as Appendix 2.

Greater Cambridge Housing and Economic Land Availability Assessment

The Greater Cambridge Housing and Economic Land Availability Assessment[6] (HELAA) should be a key evidence base document, providing strong foundations for the emerging JLP. The methodology sets out the need to include existing allocations within the list of sites, and therefore South Cambridge Local Plan Policy E1 should have ensured the sites inclusion within the HELAA. However, the HELAA fails to consider Cambridge Science Park as either an existing employment site, or as an opportunity for future intensification in its own right.

Given intensification of the existing Cambridge Science Park through the delivery of the 2050 vision provides additional employment space within an existing allocation, via the delivery of additional sustainability benefits this would appear to be a large hole in the evidence base potentially making employment allocations subject to question.

Our assumptions on how the site would perform through the HELAA assessment are included as an Appendix to this response.

We are therefore submitting a Call for Sites submission for Cambridge Science Park, usually an unnecessary step for an allocated site, but fundamentally to ensure the important economic potential of the site is considered within the emerging JLP.

As a point to note, the HELAA undertaken for the NECAAP[7] makes inconsistent references to employment land.

[5] 2041
[6] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/GCLPSDHELAAReportAug21v2Nov21.pdf
[7] Site reference OS062

Jobs Policies and Text Response

It is acknowledged that the draft JLP refers to the South Cambridge Local Plan Local Policy E1 'Cambridge Science Park' not being carried forward in the JLP due to it being superseded by Policy S/NEC. TCC has strong concerns over such an approach.

Whilst TCC supports the JLPs reference to the importance of the North East Cambridge Cluster, given the importance of CSP as one of the world's most prestigious science parks which sits right at the heart of one of the UK's fastest growing economies it is extremely disappointing that the First Proposals fails to reference either the history of, or the ongoing economic importance of CSP specifically.

From its inception, Cambridge Science Park has played a pivotal role in championing innovation and supporting the 'knowledge economy' that the region has become so famous for. This established park is recognised as a leading technology hub, with a thriving tenant base. As such its importance needs to be referenced in the draft JLP as part of an allocation while there is no certainty that the NECAAP will be adopted.

The Employment Jobs Report (GL Hearn, November 2020) which feeds into the JLP's Development Strategy Options Assessment (November 2020) is clear in its recognition of CSP.

Paragraph 4.6 of the Employment Jobs Report states:

> *"The well-established professional services offer with a cluster of technology orientated firms at Cambridge Science Park and a range of firms at Cambridge Business Park. North East Cambridge is likely to be able to build on the success of nearby premises in developing an office / technology offer."*

In addition, the Greater Cambridge Employment Land and Economic Development Evidence Study (GL Hearn et al, November 2020) references CSP as a key hub of life sciences and ICT employment and containing one of the highest concentrations of research development space in the plan area. Importantly the report also identifies strong corporate office market demand at CSP[8].

The report goes on to state that CSP is one of the most desirable locations for R&D by businesses, which would be important in developing economic clusters:

> *"The concentration of ICT businesses in Cambridge Science Park / Business Park and surrounds is recognised as the most desirable location for office / dry lab R&D premises"*[9]

Whilst the NECAAP is noted as being important in providing employment floorspace and job growth in Cambridge as a whole, this does not provide the necessary planning policy assurance that CSP requires to foster its continued successful evolution. Noting the above recognition of CSP in the draft JLP's evidence base, TCC therefore finds it detrimental to future resilience that specific recognition of CSP's importance is absent from the draft JLP.

The JLP document removes any reference to Cambridge Science Park as a location for continued employment development, and instead refers to the North East Cambridge Area Action Plan area

[8] Paragraph 7.11

[9] Para 3.34 Greater Cambridge Employment Land and Economic Development Evidence Study (GL Hearn) Nov2020

being able to accommodate '*around 15,000 new jobs (with only some of those anticipated during the Local Plan Period)*[10]. There does not appear to be any evidence to support this statement, indeed the evidence base with regard to R&D states that:

> '*The sector should continue to see growth. There are some local challenges to keeping up with demand for both wet and dry lab space, albeit there is additional floorspace coming forward including at the Genome Campus (Hinxton), Cambridge Biomedical Campus,* ***Cambridge Science Park*** *and Granta Park (Great Abington).*[11]

The JLP takes this and proposes additional employment land at the other three locations, excluding Cambridge Science Park – without explanation. The evidence then goes on to state that:

> '*GL Hearn recommends that further allocations are made to accommodate both office and wet/dry lab needs in Greater Cambridge. The role and mix therefore of North East Cambridge Area Action Plan in providing a growth overspill function is* ***essential****. It is important that this area provides a mix of B1a/b although given the location it is acknowledged to emphasise B1a office and B1b dry labs with a smaller wet lab proportion.'*
>
> *'As reported earlier it is recommended that the higher growth scenario (KS2) floorspace need is planned for. The central scenario (KS3) would see a relative fall of around 120,000 in B1a/b needs compared to the higher growth scenario and therefore is largely balanced in the current demand and supply, nullifying in quantitative terms significant employment growth needs for example at North East Cambridge. However given the level of demand in Cambridge and particularly around the Science Park, the central scenario for floorspace would be counter intuitive to market signals*[12]

This is not reflected within the JLP.

The draft North East Cambridge Area Action Plan published in 2020 referred to 20,000 new jobs being created in the North East Cambridge Area Action Plan area[13]. Within the plan period up to 2040, the draft confirmed that '*The phasing of business floorspace is anticipated to be fairly continuous throughout the plan period.*[14] This is at odds with the statement within the First Proposals local plan.

The draft North East Cambridge Area Action Plan confirmed that Cambridge Science Park will be '*the principle source of business space development in North East Cambridge.'*[15] This is continued by

[10] P56 Greater Cambridge Local Plan First Proposals – committee stage version https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/Greater%20Cambridge%20Local%20Plan%20First%20Proposals%20-%20committee%20stage.pdf
[11] Para 1.14, Page 6 https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/FINAL%20Employment%20Land%20%26%20Economic%20Evidence%20Base%20Study%20%28revised%20October%202021%29.pdf
[12] Para 7.7 and 7.8 https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/FINAL%20Employment%20Land%20%26%20Economic%20Evidence%20Base%20Study%20%28revised%20October%202021%29.pdf
[13] P24 Draft North East Cambridge Area Action Plan
[14] P261 Draft North East Cambridge Area Action Plan
[15] P139 Draft North East Cambridge Area Action Plan

Policy 12a: Business within the Proposed Submission NECAAP Regulation 19 document[16] however this is not reflected within the First Proposals document.

Without any trajectory or evidence base presented to qualify the change, the Proposed Submission NECAAP Regulation 19 document reduced the number of new jobs being created within the NECAAP area to 15,000.

In terms of specific policy and subtext in the JLP there is clear recognition of the importance of protecting the function and continued evolution of several employment sites in the Plan area. Policy J/NE New Employment Development Proposals is clear in recommending the continued support of 'Established Employment Areas in the Countryside', which references several other established employment sites in the region. Separately, Policy J/PB Protecting Existing Business Space recommends no loss of employment floorspace at specific sites. It is TCC's view that CSP should be provided equivalent policy protection under both policies reflecting its economic and employment importance to the region.

The employment evidence base is spread across a number of documents, including a jobs topic paper, strategy topic paper, housing and employment relationships report, economic evidence base study, strategic spatial options appraisal and employment supplement. These documents often refer to other documents rather than setting out the employment strategy succinctly in one place.

This makes following the rationale for the employment proposals difficult, indeed the plan makers appear to be repeating the document trails which led to the following comment being made by the Inspector for the previous Local Plan:

> *Following a further request the Councils provided a more detailed Note of where this information could be found. The Note provides more detailed references across a significant number of documents, but this kind of paper trail does not aid clear comprehension*[17]

TCC continues to offer support to Planning Officers in terms of meeting with our economic advisors to assist in the production of a robust economic evidence base for the JLP.

NECAAP

Continued sustainable economic growth on Cambridge Science Park is not reliant upon delivery of Anglia Water's relocation of the Cambridge Waste Water Treatment Plant and associated Development Consent Order.

TCC is fully supportive of the delivery of the Anglia Water project and the resultant regeneration of North East Cambridge. However, as the relocation project is a Nationally Significant Infrastructure Project (NSIP) the ultimate decision will not be made by Greater Cambridge Local Planning Authority.

[16] https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/NECAAPNorthEastCambridgeAreaActionPlanReg192020v22021.pdf
[17] https://www.scambs.gov.uk/media/9238/letter-from-inspectors-to-councils-preliminary-conclusions-200515.pdf

Anglian Water will submit a Development Consent Order (DCO) application to the Planning Inspectorate (PINS). This in itself introduces a level of risk to the wider area coming forward. If for any reason the DCO is unsuccessful the wider NEC Area Action Plan Area may face a policy vacuum. This is compounded by the reliance of the HIF funding required to make the scheme viable relating to the success of the DCO process.

The removal of Policy E/1 and the replacement with Policy S/NEC: North East Cambridge as currently set out on pages 55 to 58 of the JLP conflates delivery of the Anglia water site with the continued growth of an existing high performing employment location.

Whilst spatially connected, the text within the JLP underplays the evidence base supporting continued growth at and around Cambridge Science Park and focusses the policy on the delivery of the Core Site.

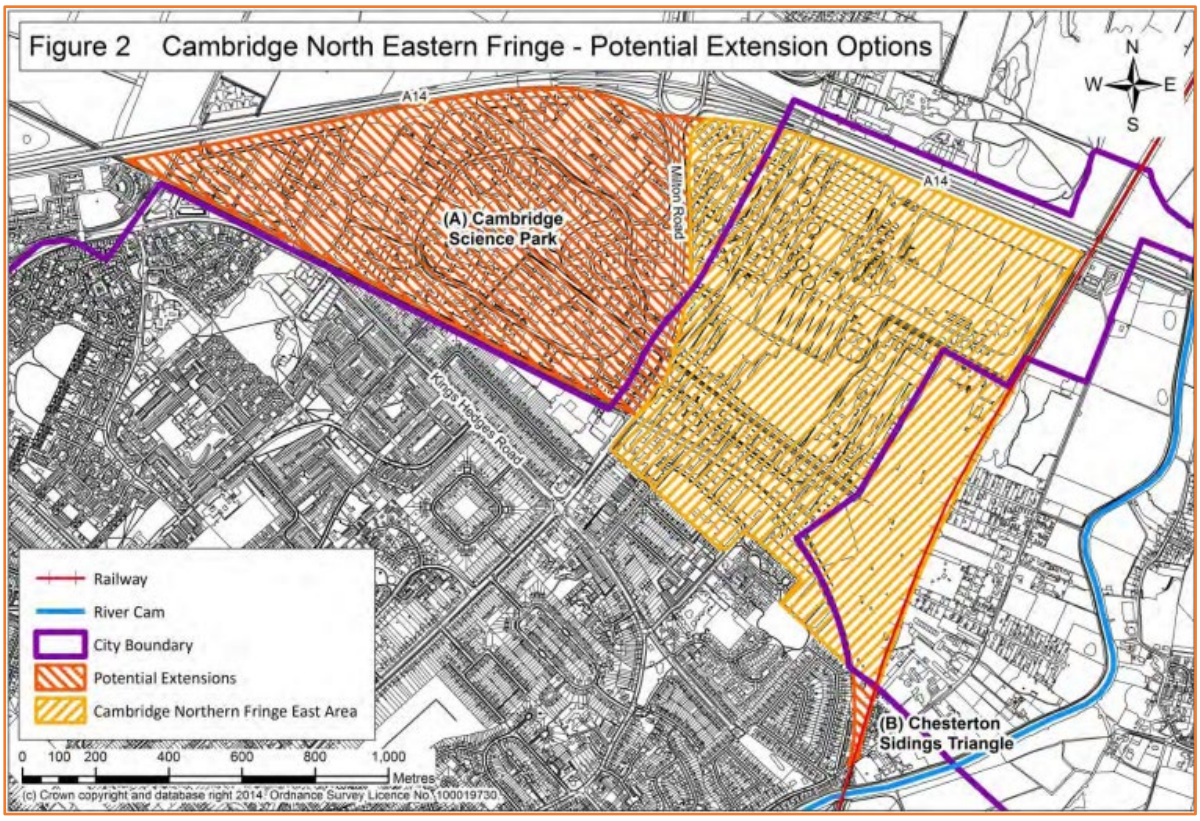


Figure 3: The original AAP area, with a Cambridge Science Park extension shown[18]

In 2014, the Employment Options Study[19] confirmed within it's first paragraph that:

> *1.1 The Cambridge Northern Fringe East area is highly important for the long term growth of Cambridge. Lying within the A14 and outside the Green Belt, the area contains Cambridge Business Park, the most successful office based business park in Cambridge, and St John's Innovation Park, and abuts Cambridge Science Park, one of the most important employment locations in the city.*

[18] P15 https://www.scambs.gov.uk/media/8564/final-cnfe-issues-and-options-report.pdf
[19] https://www.scambs.gov.uk/media/8557/final-cnfe-aap-employment-options-study-final-report.pdf

TCC fully supports delivery of the Core Site, and the regeneration of this Brownfield Site, however, the NEC Policy area is wider than the Core Site alone and includes key employment sites including Cambridge Science Park and the St Johns Innovation Park together with Cambridge Regional College, the largest further education college in the East of England.

Transport capacity is a key constraint to the delivery of the NECAAP and to date this issue remains unresolved.

The key concern here relates to how committed development at CSP has been considered and the level of trips assumed within CSP. The original Evidence Base seems to make some allowance for this without setting this out in detail. This should be provided.

Figures suggest that an increase in trips over the 2017 baseline are assumed. However, the modelling used to set the Trip Budgets is not based on the scenario that allows for committed developments, instead using the 2017 situation as the baseline. An NECAAP baseline based on 2017 misses large amounts of committed development.

Effectively this means that not only is the NECAAP expected to deliver development without increasing trips but is also expected to reduce overall trips into the NECAAP below that already approved through the granting of previous planning permissions. These permissions are already being implemented which puts question the deliverability of the NECAAP.

The clear conclusion here must be that in order for the NECAAP to come forward, CSP must reduce its peak hour vehicle trip attraction below that already considered acceptable by the planning and highway authorities for the benefit of development across the wider NECAAP.

The NECAAP Policy as currently set out within the emerging JLP is therefore a constraint policy on economic development at the existing Cambridge Science Park – counter to paragraph 81 of the NPPF (explored further below).

It therefore begs the question of what happens if no further growth other than committed development at CSP takes place and no reduction in trips occur. This overreliance on the reduction in trips without securing effective transport solutions is a clear concern.

Indeed, the JLP recognises this potential issue on page 17, stating that

> *'we need to have evidence of whether the North East Cambridge proposals (see Strategy S/NEC) that form a key part of the development strategy are deliverable.'*

Given the comment above, officers are advised to consider the implications of the Inspectors Preliminary Conclusions to the Tandridge District Council Local Plan examination [20] if there is any doubt over the deliverability of the site.

This point was confirmed by planning officers during the online webinar held on the 25th November 2021 acknowledging that additional policies would need to be added in to the JLP should the DCO not proceed as anticipated. This is a flawed approach, whereby policies should be included until

20 https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/Examination%20matters%20and%20documents/ID-16-Inspector-Preliminary-Conclusions-Advice.pdf

such time as they should be removed to operate in any other way would be counter to the benefits and certainty afforded by a plan-led system.

The NPPF is clear on the importance of a plan-led system:

> *15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*[21]

The potential unintended consequence of the approach being taken in the emerging JLP is restrictions to the evidenced need for additional employment land in this location resulting from a policy vacuum whilst additional weight is applied to a 'holding' policy which in turn is reliant on an entirely separate DCO process to progress.

It is understood that the original intention behind this was to enhance the NECAAP by bringing in a really important regional employer and providing opportunities to provide for a genuinely innovative quarter to the City.

However, the JLP and draft AAP published have resulted in the loss of a Policy for CSP – unjustified by the supporting text and uncertainty with regard to the continued growth and importance of Cambridge Science Park.

Inconsistent with National Planning Policy

Crucially as currently written, the JLP is inconsistent with the NPPF; Paragraph 81 is clear:

> *Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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. 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.*

Footnote 42 goes onto state that:

> *The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future*

Counter to this the emerging JLP is silent on one of Greater Cambridges largest employment sites.

[21] NPPF (2021)

An Economic Strategy that supports Life Sciences and Green Innovation

The JLP rightly recognises the importance of the Cambridge economy, and the importance of life sciences. The JLP also recognises the climate change challenge faced and sets out a vision based on a 'big decrease in our climate impacts'. However, the Cambridge Science economy goes beyond life sciences and provides an opportunity to provide a catalyst for the innovation required to achieve the commitment to sustainability and achieving climate change reductions.

Cambridge has already established itself as a location for battery and other renewable tech initiatives[22], and the local plan provides an opportunity to recognise the importance of revolutionary Cleantech and renewables technologies. The plan should recognise the role that the Cambridge economy can play within the UK Government's Ten Point Plan for a Green Industrial Revolution.

TCC has made a commitment to achieve Net Zero by 2050, but it is also conscious that a substantial part of the mitigation effort needs to take place in the next decade. TCC's position on a global stage as educator, researcher and influencer infer a responsibility to go beyond Net Zero sooner and wherever possible. Proposed expansions to CSP provide a unique opportunity to showcase the achievement of Net Positive Impact in carbon, water, biodiversity, air quality and material throughout its entire lifecycle, from the design process, through to construction, the phasing, operation and its influence on the ongoing rejuvenation of the existing CSP.

Suggested Policy Wording.

Given the recognition of all other comparable science parks and employment destinations within the emerging JLP, and the recognition that North East Cambridge is the most sustainable location for development in Greater Cambridge.

The emerging JLP should therefore include the following policy:

> **Policy S/CSP: New Employment Provision – Cambridge Science Park**
>
> **Appropriate proposals for employment development and redevelopment on Cambridge Science Park (as defined on the Policies Map) will be supported, where they enable the continued development of the Cambridge Cluster of high technology research and development companies.**

[22] Examples include: https://www.cambridgesciencepark.co.uk/news/jm-and-hystar-partner-develop-next-generation-electrolyser-technology-accelerate-green-hydrogen-production-1252/ and https://www.cambridgesciencepark.co.uk/company-directory/nyobolt/

In summary

Whilst the principle of the draft JLP is supported, as an employment destination of local, regional, and national importance, TCC would like it on record that it has deep concerns relating to Cambridge Science Park's removal as an Employment Allocation within the JLP.

The evidence base is inconsistent, difficult to follow, and in places flawed; CSP is recognised as a crucial element of the Greater Cambridge Economy, and yet excluded from the HELAA and ultimately inclusion within the JLP.

The silence afforded to Cambridge Science Park (other than via removal) is unjustified by the evidence base, and inconsistent with the vast number of strategic and less than strategic employment locations specifically mentioned and supported within proposed policy.

The exclusion of a draft allocation places an undue reliance on an emerging North-East Cambridge Area Action Plan (NECAAP) being adopted and the Development Consent Order (DCO) for the relocation of the existing Cowley Road Waste Recycling Centre being achieved. This conflates the delivery of new homes reliant on the DCO with the ongoing growth of employment associated with the existing Cambridge Science Park cluster.

Transport capacity is a key constraint to the delivery of the NECAAP and to date this issue remains unresolved. The deliverability of NECAAP is untested.

Whilst TCC supports the successful conclusion of the DCO process and the broad principles of a NECAAP, it is crucial that CSP's importance is recognised in the emerging JLP.

An allocation provides the supporting policy and development management framework to recognise and harness CSP's continued evolution and regional role as a significant contributor to employment, research and development for the Cambridge and UK economy. The policy wording as set out above should therefore be (re)instated into the emerging JLP.

Yours Sincerely

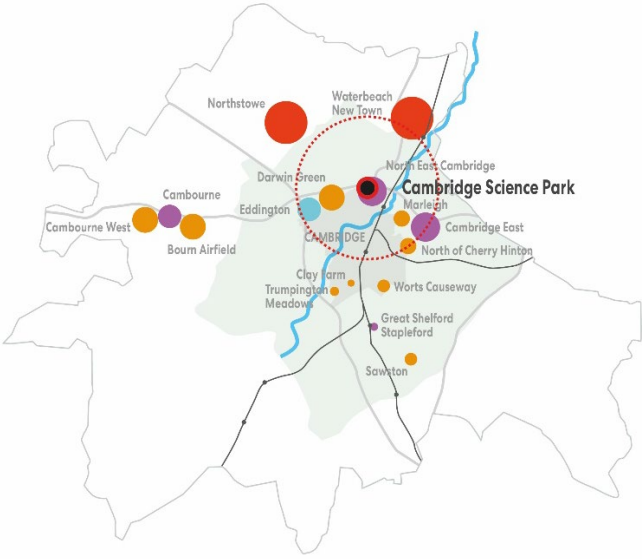
[redacted]

Emma Woods
Director
[redacted]

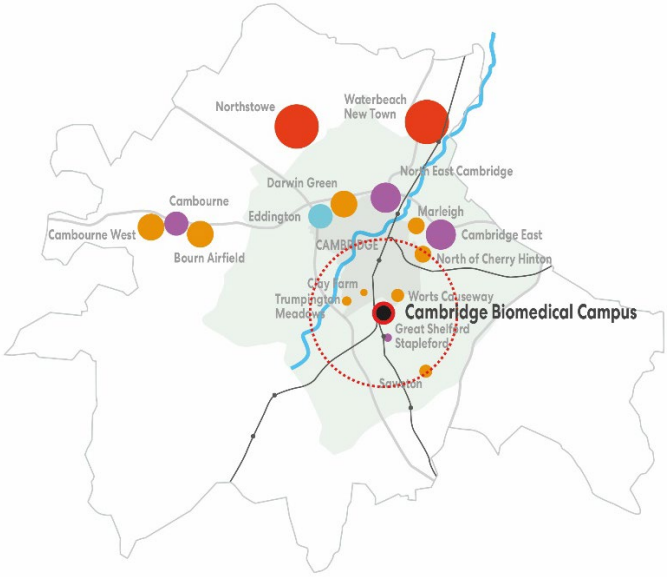
Encl

Cc: Dick Wise, Bidwells
Hugh Morgan, DP9

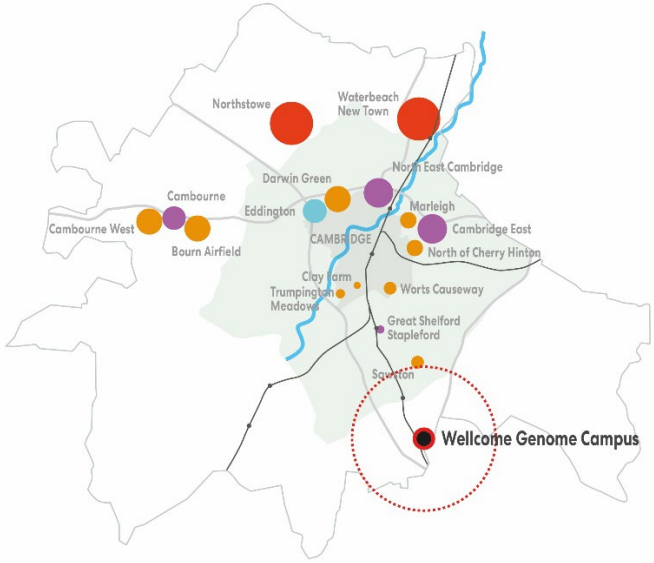
Appendix 1 – Key Science Employment Sites

Employment Site	Size	Number of companies / employees	JLP additional homes growth
Cambridge Science Park[23]	152acres (61.5ha) 2.7M sq ft of existing and permitted buildings	130 companies Circa 7,500 employees	

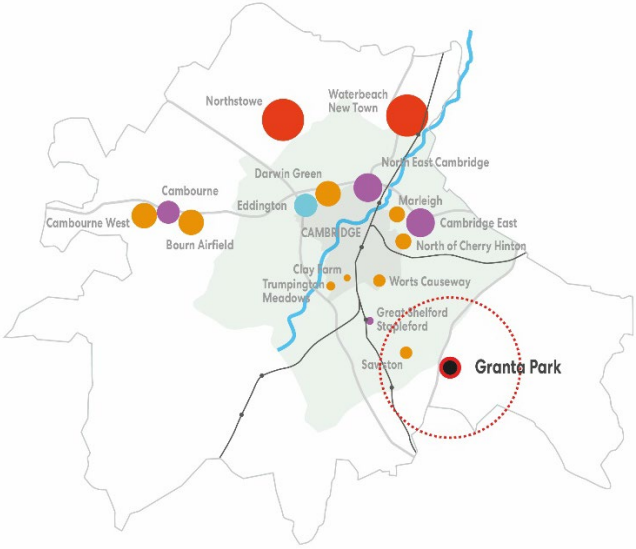
[23] https://www.cambridgesciencepark.co.uk/

Employment Site	Size	Number of companies / employees	JLP additional homes growth
Cambridge Biomedical Campus[24] (Ph1 and Ph2)	68ha 1.8M sq ft	Circa 17,500 Nb – includes hospital employees	

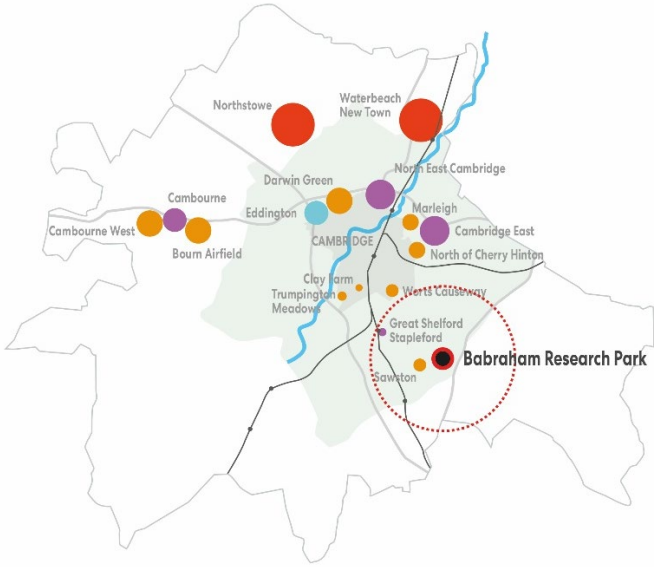
[24] https://cambridge-biomedical.com/

Employment Site	Size	Number of companies / employees	JLP additional homes growth
Wellcome Genome Campus[25]	125acres (50.5ha) 800,000 sq ft of existing Further 1.6M sq ft permitted	Circa 2,600 existing employees (rising to 6,800 via outline permission)	

[25] https://www.wellcomegenomecampus.org/

Employment Site	Size	Number of companies / employees	JLP additional homes growth
Granta Park[26]	120acres (48.5 ha) 1.3M sq ft of existing buildings	30 companies Circa 3,700 employees	

[26] https://www.grantapark.co.uk/

Employment Site	Size	Number of companies / employees	JLP additional homes growth
Babraham Research Park[27]	430acres (170 ha)	60 companies Circa 2,000 employees and 300 academic researchers	

[27] https://www.babraham.com/

Appendix 2 – Floorspace Breakdown

Approximate Floorspace Summary	Added Floorspace GEA (Million/SQFT)	Total Floorspace GEA (Million/SQFT)
Where we are today:		
Total existing & consented (420, 440, 214-240 extensions, 270 master plan excluding 250-260)	-	**2.73**
Anticipated Trinity projects 2020-2025*		
Parcel 18 (420), Parcel 52 (440) - included in 'where we are today' total.	0.15	2.73
Parcel 55 - shared compact parking facility	n/a	n/a
Anticipated long leaseholder projects 2020-2025		
Parcel 31 (127) CamProp	0.07	2.80
Anticipated Trinity projects 2025-2030*		
Parcel 4 (28,31-35), Parcel 45 (250-260)	0.24	3.04
2040 Vision Totals (Includes retained and proposed floorspace)	1.75	**4.79**
Breakdown by ownership:		
Aspirational total floorspace within Trinity ownership by 2040	-	2.98
Anticipated approx. floorspace within long lease holder ownership by 2040	-	1.81

**subject agreement (parking ratios, yield, etc.)*

Appendix 3 – HELAA

HELAA		
Site	**Cambridge Science Park**	
Address	Cambridge Science Park, Milton Road Cambridge United Kingdom CB4 0FZ	
Suitable: overall assessment		
Adopted Development Plan Policies	Adopted Policy E/1 supports further densification of employment use on the site.	
Flood Risk	Entire site flood zone 1 Low risk from surface water flooding within localised areas.	
Landscape and Townscape	The site is an existing business and research park at the boundary between South Cambs District Council and Cambridge City Council. Entirely brownfield, the site is currently the subject of masterplanning through NECAAP. The landscape impacts on this site are low due to the existing nature of the site. Tree retention and additional planting encouraged. Falls mostly in the NCA88 Beds and Cambs Claylands but is influenced by the adjacency of the NCA46 Fens character area. The District Character area is identified as Fen Edge Landscape Character Assessment (2021) Landscape Character Area - Urban	
Biodiversity and Geodiversity	Within 200m of a Wildlife Site Any discharge of water or liquid waste of more than 20m³ to ground a day may require Natural England consultation. The site is opposite Greenbelt land known to contain broadleaved deciduous woodland priority habitat, as well as grasslands, hedges and wooded boundaries which are also likely to have ecological value. There are no other apparent priority habitats within the site; however, there are buildings, grasslands, wooded areas, hedges, and wooded boundaries on site that are likely to have ecological value. Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.	
Open Space/ Green Infrastructure	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.	
Historic Environment	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.	
Archaeology	No significant archaeology likely to survive in this area	
Accessibility to Services and Facilities	Distance to Primary School: Greater than 1,000m Distance to Secondary School: Greater than 2,000m Distance to Healthcare Service: Greater than 720m and Less than or Equal to 2,000m Distance to City, District or Rural Centre: Greater than 2,000m Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 720m and Less than or Equal to 2,000m Distance to Employment Opportunities: Less than or Equal to 1,800m Distance to Public Transport: Less than or Equal to 450m Distance to Rapid Public Transport: Less than or Equal to 1,800m Distance to proposed Rapid Public Transport: Less than or Equal to 1,800m Distance to Cycle Network: Less than or Equal to 800m Good accessibility to key local services, transport, and employment opportunities Proposed development would not require delivery of accompanying key services	
Site Access	The proposed site is acceptable in principle subject to detailed design. Existing access arrangements can be used.	
Transport and Roads	This site makes up part of the North East Cambridge Area Action Plan. The development must comply to trip budgets and car parking budgets set by the Area Action Plan (AAP) and will be expecting to provide a high sustainable mode share. The sites within the AAP will require a compelling transport strategy to understand cumulative growth. Furthermore, sites in this area will have to make strategic financial contributions to the area transport package. Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	
Noise, Vibration, Odour and light pollution	The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation	
Air Quality	No net increase in vehicular movements, therefore low risk in regard to air quality	
Contamination and Ground Stability	Brownfield site, contamination expected, conditions required	
Further Constraints – Constraints to development	Electricity pylons on site	
Further Constraints – Strategic Highways Impact	Within Highways England Zone 3 - A14 CNB No capacity for growth. Sites would need to ensure no net increase in vehicles trips on the Strategic Road Network.	
Further Constraints – Employment	Seek intensification of key employment site for employment uses.	

Green Belt Assessment of Harm	N/A	
Overall Outcome Available		
Is the site controlled by a developer or landowner who has expressed an intention to develop?	Yes	
Are there known legal or ownership impediments to development?	No	
Is there planning permission to develop the Site?	Yes in part	
When will the site be available for development?	0-5 6-10 and 10+	
Overall Outcome Achievable		
Is there a reasonable prospect that the site will be developed?	Potential for land to be promoted by land owner. Non-residential development likely to economically viable at an appropriate density	
Development Potential		
Estimated dwellings per hectare	N/A	
Estimated dwelling units	N/A	
Estimated employment space sqm	289,888sqm from April 2020 to March 2040	
Estimated start date	Ongoing	
Estimated annual build-out rate (pa)_		
Development completion timescales (years)	Ongoing	