

**MSC7/20801/59887/96/68/59902/05/11**  
**MSC7/25320/65419/65420**

**LOCAL EXAMINATION**

**South Cambridgeshire Matter CS7**

**Building a strong and competitive economy**

**Issue SC7A.1**

**and**

**Issue SC7A.3**

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**On behalf of:**

**Pigeon Land Ltd and**  
**Land Improvement Holdings Ltd**

**25 November 2016**





## 1 Introduction

1.1 This statement deals with question i) under Issue SC7A.1:

- i) *Does the plan allocate sufficient space for B1(b) research and development uses on the edge of Cambridge?*

1.2 The statement also deals with two questions under Issue SC7A.3 relating to the proposed modifications PM/SC/8/A and PM/SC/8/B:

- i) *Could the exceptional circumstances necessary to release land from the green belt be demonstrated in relation to the campus extension development?*  
xi) *Would the site be of sufficient size to meet the needs of bio-medical and health care research in this locality?*

1.3 The evidence presented here has in part been previously submitted during the course of the inspectors' consideration of earlier matters (Matters 4, 6, 9c and CC4 and PM2 in particular and referenced in Appendix 1).

1.4 Given the time between the deadline for submitting statements and the relevant hearing session on 28 February 2017, the objector would wish to reserve the right to provide any further relevant updates in the identification of need and provision of sufficient suitable land.

1.5 The statement, together with earlier relevant evidence, seeks to summarise and reinforce the following points:

### **Insufficient space for life sciences, bio-medical research and health care requiring a location in close proximity to the CBC including Addenbrooke's**

- a) existence and definition of the sub-sector;
- b) importance of sub-sector to the UK and Cambridge;
- c) land requirements for the sub-sector;
- d) shortage of land to meet the requirements of the sub-sector;
- e) plan unsound in respect of:
  - a. not justified with up-to-date and robust evidence;
  - b. not in compliance with government policy, particularly in its failure to plan positively for the location, promotion and expansion of clusters and to be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (para 21 NPPF);
  - c. not effective in the delivery of the local plan's stated economic development strategy that "seeks to maintain a progressive, modern, innovative, balanced and resilient economy and be open for new business" (para 8.3 – SCDC Submission Plan RD/Sub/SC/010).
- f) the case and evidence provided by the objectors contrasts substantially with the council's lack of up-to-date evidence and consideration of the obvious market signals, market intelligence from practicing stakeholders and the changes in economic circumstances and opportunities.

### **Proposed modification**

- g) While welcoming and supporting the attempt to identify additional land to meet the requirements of the sub-sector the proposed modifications rely on a site which is:
  - insufficient to meet the requirements of the sub-sector both in the plan period and in the short term;
  - not deliverable;
  - not justified by evidence of exceptional circumstances other than that contained in the evidence submitted on behalf of the objectors;



- not justified against a consideration of reasonable alternatives.

h) the proposed modification, therefore, fails to 'repair' the unsoundness of the plan.

## 2 **Insufficient space for B1(b) research and development uses on the edge of Cambridge**

### **Existence and definition of sector**

- 2.1 There is a core element of research and health care which requires to be located in close proximity to the 'heart' of research and practice for life sciences, bio-medical and health care. The CBC which is the only location in the Cambridge research cluster which houses the important and substantial Addenbrooke's hospital and soon also to accommodate Papworth Hospital displays very special and unique attributes at the heart. The existence of a large research orientated hospital provides absolutely unique access to medical trials, live tissue, clinicians, expertise and networking opportunities. The congregation of other organisations, including MRC, Cancer Research UK, Astra Zeneca, University of Cambridge research teams and others have then provided additional reason for co-location.
- 2.2 The inspectors are referred to the various elements of evidence contained in the Matter 4 statement and in particular the paper prepared by Creative Places at Appendix 1 detailing the 'open innovation' model which exists and thrives at the CBC (M4 5102/20801).
- 2.3 The recent Cambridge Bio-science Impact Study prepared by CEA and Cambridge Econometrics in October 2015 and attached at Appendix 1 of Matter CC4 Statement MCC4/5102 adds further weight to the importance and definition of the sub-sector in close proximity to CBC.
- 2.4 Recent further work carried out by Creative Places focusses on the locational bias of life science research representation in Cambridge. This illustrates a real concentration at CBC where the networking and collaboration elements of research are particularly important. This paper was included at Appendix 3 of Matter CC4 Statement (MCC4/5102) but attached again here as Appendix 2.
- 2.5 It is worth emphasising the statement of Astra Zeneca's vice president in his letter to SCDC in May 2014 (Appendix 3):
- "We have become aware of the lack of available commercial space within the greater Cambridge area, particularly with walking or short cycling distance from our new facility at the Bio-medical Campus."*
- 2.6 Other letters from practising stakeholders contained at Appendix 1 of M4 Statement (M4/5102/20801) confirm the important locational benefits of the CBC. They include a letter from the University of Cambridge (UoC) dated October 2015. A more recent letter from the Greater Cambridge Greater Peterborough Enterprise Partnership dated 8 November 2016 adds further weight (Appendix 3). The UoC letter further emphasises the statement made by the then vice chancellor of Cambridge University and quoted at paragraph 5.2 of Matter 4 statement, Appendix 1 (M4/5102/20801):
- "For companies seeking an environment where they can translate their research into clinical benefit and regularly interact with some of the world's most influential academics, there is no better place than the Cambridge Bio-medical Campus."*
- 2.7 Although the council has variously resisted an admission that the sub-sector exists, I sense that this stance is moving towards acceptance with the acknowledgement of the fact that the existing CBC planning permissions have a section 106 requirement to restrict occupancy to those organisations who



can demonstrate a need to be located in close proximity to the CBC (Appendix 4) and the references to the locational benefits to allocate additional land to the south of the CBC in the councils' justification for the proposed modification PM/SC/8A and PM/SC/8B.

### **Importance of sector to the UK and Cambridge**

- 2.8 There can be little dispute that the success of the Cambridge economy is an important contributor to the UK and world economy. There can also be little dispute that the scientific sectors of Cambridge are an essential part of that success.
- 2.9 The inspectors are referred to paragraphs 3.1 – 3.5 of Matter CC4/5102 statement together with its Appendices 1 and 2. These include the recently published Cities Outlook 2016 report and the Cambridge Bio-science Impact Assessment Study.

### **Shortage of available space**

- 2.10 Appendix 5 confirms that following recent land deals with life science, bio-medical and health care companies and organisations there now remains only 3.2ha of land at CBC to accommodate requirements up to 2031. When using the past take-up rates this equates to only 1.04 years of supply. This is neither sufficient for the plan period nor even the immediate short term period.
- 2.11 The councils' contention has been that there is sufficient other land elsewhere in the Cambridge sub-region. They have previously focussed attention on the possible provision of land at Cambridge Northern Fringe East (CNFE), CSP, Granta Park and Babraham Institute but it is clear from paragraphs 2.1 - 2.8 above that any land which is available or may, subject to substantial delivery challenges at CNFE, be available while welcomed would simply be performing a different function within the wider sector. They do not display the same locational benefits to the heart of the CBC cluster.
- 2.12 The councils' case contended at Matter 4 that the ELR demonstrated there is sufficient land to meet employment projections in the two districts. This work and contention failed to distinguish in sufficient detail between the specific requirements of sectors. The councils have relied on the anticipated 16.43ha of land allocated at CBC in the Cambridge City Local Plan to accommodate the needs of the sector (RD/Sub/C/010).
- 2.13 The concern of practising stakeholders about the shortage of land and the worrying dismissal of that concern by the councils is illustrated by the UoC's clear stance and the unfortunate need for them to correct CCC's misrepresentation at the Matter CC4 hearing session (Appendix 6).
- 2.14 The UoC's position is clear and beyond doubt:  
*"With so little land now available at the Campus, the University supports the provisional modification to release land from the green belt to enable further expansion. The additional allocation of land to meet the future development needs of the life sciences sector is helpful but the scale of the allocation (8.91ha) is unlikely to be sufficient for the plan period to 2031. More still needs to be done to plan for the development needs of the sector on the south side of Cambridge close to the bio-medical campus."*  
[my underlining]
- 2.15 The UoC is an important part of demonstrating the need case. Its opinions are not confined to a single interest group of scientists or practitioners but represents an extensive network of scientific research and practice. As illustrated in Appendix 2, the co-locational benefits of close proximity to the CBC and



Addenbrooke's already involves numerous university departments and cross fertilisation of ideas and scientific research and discovery.

- 2.16 The councils' reluctance to admit a shortage of available land or even investigate it is contrary to advice in the NPPF and paragraph 2a-030-2014036 of the PPG. The guidance (attached at Appendix 7) urges authorities to liaise closely with the business community, consider market intelligence, market signals, recent statistics on take-up of sites and the locational requirements of particular types of business.
- 2.17 The lack of evidence put forward by the council to explain how they consider the plan meets the requirements of the sub-sector contrasts substantially with our own case and evidence. As a result, the plan remains unsound in one of the principal areas of most importance to the government's drive for deliverable, flexible, sustainable and economic imperatives explained in paragraphs 7 and 18 - 21 of the NPPF.

### 3 **Proposed modification**

- 3.1 The objectors would support allocation of any appropriate, justified and deliverable additional land designed to meet the needs of the sub-sector as described above.
- 3.2 However, the proposed modification (PM) site fails to satisfy the principles of being appropriate, justified and deliverable.

#### **Insufficient size to meet needs**

- 3.3 The PM site measures 8.91ha. The evidence presented to the Full Council on 17 November 2016 explains in Appendix F and with reference to the Preliminary Site Access Study that due to highway constraints the site would be suitable for approximately 30,685sqm.
- 3.4 If this were added to the higher calculation of plot ratio discussed at the Matter CC4 session of 38,500sqm available from the remaining land on CBC Phase 2 (see Matter CC4 Statement MCC4/5102) a total of 69,185sqm would remain for the plan period.
- 3.5 Based on a conservative estimate of take-up rates at 60% of the highest annual CBC take-up in recent years (Appendix 5) only 2.5 years would remain available from now ( $69,185\text{sqm} \div 27,600\text{sqm pa} = 2.5$  years). There would be no land to accommodate the sub-sector from the mid-year 2018. This would be well before the completion of even a 'fast-track' review of the Local Plan.
- 3.6 To the clear shortage of land and its anticipated availability only until 2018, one needs to consider the factor that in a sector which requires certainty of expansion potential for as yet still to be discovered advancements in science the shortage of land is likely to discourage early commitment to Cambridge. Organisations and companies are very likely to choose other competing locations around the world.

#### **Site not deliverable**

- 3.7 Any site which is promoted in the plan which purports to contribute to meeting the economic development strategy must demonstrate its deliverability.
- 3.8 If one adopts for economic development the reasonable tests of deliverability found in paragraph 47 of the NPPF for housing development one could fairly seek to consider employment allocations against the tests of 'realistic prospect' or 'reasonable prospect' of delivery.



3.9 The PM site has no direct access to the highway network. The inspectors will note under the SA Addendum Report objective 22 and in table 10.3 of the same document that access is described as follows:

*“The site does not benefit from direct access to the local highway networks, as such, the most logical point of access to the site would appear to be via the proposed CBC Phase 2 development.”*

3.10 The Preliminary Site Access Study prepared to support the PM states at paragraph 5.12 that,  
*“It is intended to be accessed via the Phase 2 development site. It is acknowledged though that in relying on the Phase 2 access proposals to allow the development to take place on the proposed site that agreement will need to be sought with the landowner”.*

3.11 Figure 7 of the study and the illustrative masterplan also show access through the Phase 2 development.

3.12 No discussion has taken place with the appropriate landowners. In fact, we understand that the landowners wrote to the council following the publication of the planning portfolio holders' meeting report on 8 November 2016 and before the Full Council decision to submit the PM confirming that due to a written agreement signed in 2014 access to the site cannot be accommodated through CBC Phase 2.

#### **No justified exceptional circumstances**

3.13 In direct answer to the inspectors' question i) under Issue SC7A.3 I believe that the exceptional circumstance of land requirements to accommodate the needs of the sub-sector described above, could be demonstrated **IF** an appropriately focussed assessment had been carried out.

3.14 Clearly, based on our evidence, we believe there is a need, albeit that the site chosen makes an insufficient contribution in meeting that need, in any case cannot be delivered and has not been fully tested against reasonable alternatives.

3.15 The council has made scant reference to exceptional circumstances. The council's justification for the PM states:

*“The council considers that the need for jobs can comprise exceptional circumstances justifying the review of the green belt so far as this would not cause significant harm to green belt purposes.”*

3.16 In our view, this is inadequate to satisfy the requirement to demonstrate exceptional circumstances. We are also of the view that the council is incorrect in applying a caveat to the exceptional circumstance of need for jobs with reference to “so far as this would not cause significant harm to green belt purposes”.

3.17 As detailed in our report submitted 25 January 2016 to the councils in response to the public consultation on the proposed modifications (Appendix 8) the requirement of the NPPF and the stages of necessary assessment require the council to:

- establish exceptional circumstances;
- if there are sufficient exceptional circumstances then assess the sustainability credentials of an individual site against reasonable alternatives. This would require an addendum to the SA;
- at this stage assess the likely harm to green belt purposes against the reasonable alternatives of a similar sized and functioning site.



### **No assessment against reasonable alternatives**

- 3.18 In promoting a new site on land previously identified as unsuitable for development and of very high value for green belt purposes, the council has clearly assessed the PM as a significant change justifying an amendment to the SA. In doing so, we would have anticipated the SA Addendum of 2015 updated 2016 (RD/MC/020 and RD/MC/021) should assess the site against reasonable alternatives of a similar size and capable of performing a similar function in meeting the identified exceptional circumstance.
- 3.19 One of our fundamental issues throughout the hearing sessions has been to point out the need to assess in the SA and green belt appraisal and appropriate addendums all reasonable alternatives which are realistic, distinct and of a similar size and function to the preferred site. We make reference to PPG ID: 11-018-20140306 (Appendix 9).

### **4 Soundness of plan**

- 4.1 For all the reasons explained above and within the evidence base provided by the objectors in Matters 4, 6, 9c and CC4 the plan fails the tests of being positively prepared, justified, effective and consistent with national policy.
- 4.2 The PM fails to repair the unsoundness of the plan because the recommended site is insufficient in size, not deliverable, not justified against exceptional circumstances (other than the need evidence submitted by the objector) and not justified against reasonable alternatives.
- 4.3 In my view, there are a number of choices available to the council which may assist in repairing what I consider to be a clear failure to produce a sound plan:
- confirm the objectively assessed need for development requirements to meet the needs identified in sections 2 and 3 above;
  - identify suitable and deliverable land in sufficiently close proximity to CBC to meet the need and which is available in the short term;
  - properly assess that land against reasonable alternatives;
  - at the very minimum identify suitable safeguarded land.



## List of Appendices

- 1 Previously submitted relevant evidence
- 2 Cambridge – principal nodes of health care relevant life sciences research  
(Creative Places 29 August 2015)
- 3 Selected market intelligence letters:
  - Astra Zeneca (12 may 2014)
  - University of Cambridge (6 October 2016)
  - Greater Cambridge Great Peterborough Enterprise Partnership (8 November 2016)
- 4 CBC S106 extract
- 5 CBC land take-up and availability
- 6 University of Cambridge letter re Matter CC4 hearing dated 14 September 2016
- 7 Extract from Planning Practice Guidance – paragraph 30
- 8 Reps to SCDC re proposed modification dated 25 January 2016
- 9 Extract from Planning Practice Guidance – paragraph 18





## **Appendix 1 – Previously submitted relevant evidence**

- Matter 4      Statement M4 CCC 5102; M4 SCDC/20801  
Appendix 1 – CP Business Needs of the R&D sector  
Appendix 2 – Bidwells R&D Market  
Appendix 3 – Update Economic Needs Assessment
- Matter 6      Statement (M6 CCC/5102; M6 SCDC/20801)  
Supplementary statement (M6 CCC/5102I M6 SCDC/20801)
- Matter 9c     Statement (M9c CCC/5102; M9c SCDC/20801)  
Supplementary statement (M9c CCC/5102; M9c SCDC/20801)
- Matter CC4   Statement (M CC4/5102)  
Appendix 1 – Cambridge Bioscience Impact Assessment Study October 2015 prepared by CEA and Cambridge Econometrics  
Appendix 2 – Cities Outlook 2016 prepared by Centre for Cities  
Appendix 3 – Cambridge – Principal nodes of health care relevant life sciences research. Prepared by Creative Places June 2015.  
Appendix 4 – University of Cambridge letters to CCC and SCDC dated 6 October 2015  
Appendix 5 – CBC Land Take-up. Prepared by Bidwells April 2016
- Matter PM2   Statement (MPM2/25320)