

Matter SC7 – Building a Strong and Competitive Economy

**Sub-Matter SC7A.2 Policy E/1: New Employment Provision – Cambridge
Science Park**

Representation Number: 58932

Representation Identification: 20942

Examination in Public of the SCDC Submitted Local Plan 2013

Written Statement from Cambridge Past, Present & Future

25th November, 2016

Matter SC7: Building a Strong and Competitive Economy

Matter SC7A.2 Policy E/1: New Employment Provision – Cambridge Science Park Representation 58932

Issue ii.:

Should the policy be more specific in terms of the nature of employment use and density requirements for employment development on the site?

- CambridgePPF believes that seeking to impose a density threshold on further development at the Cambridge Science Park (CSP) is probably unhelpful when the site is already occupied – albeit at a very low density.
- Encouraging certain types of employment use would be constructive. If it is recognised that there is a lack of employment space in Cambridge for certain types of use – for example wet lab space or growth and nurturing (incubation) space – then the policy should promote such development. Locating such employment use at the heart of an existing research cluster like the CSP would be more sensible than in an isolated site on the edge of the city.

Issue iii.:

Is there an over concentration of car parking provision at the Science Park?

- CambridgePPF has argued under Matter 2 that there are sufficient brownfield and low density areas suitable for re-development to meet projected demand for housing and employment within the City and South Cambridgeshire without the need for further release of Green Belt around the city fringe. The CSP is a prime candidate for the provision of further employment space in view of the large area currently given over to surface car-parking and the low density of early development phases.
- As Paragraph 8.13 states, the early phases of the CSP date back to the 1970's when space was not at the premium it now commands. It is the belief of CambridgePPF that additional employment space could be made available at the CSP if cars could be stacked in a multi-storey park rather than spread over such a large area. This sort of infilling should be given priority in the development sequence over greenfield sites, not least because siting new employment within existing clusters is clearly sensible and practical.

Issue iv.:

Would the preparation of a masterplan assist in securing sustainable development on the site?

- CambridgePPF has for long argued that a new masterplan was needed for the CSP to show how employment densification could be achieved in a sustainable way. The masterplan should be developed in conjunction with the masterplan for the re-development of the Cambridge Northern Fringe (East) (Policy SS/4) to show how the whole area can benefit from the new Cambridge North railway station

Changes to the Plan:

Policy E/1 should be re-written as follows:

1. *Appropriate proposals for employment development and re-development on the Cambridge Science Park (as defined on the Policies Map) through infilling to increase the development density will be supported where they enable the continued development of the Cambridge Cluster of high technology research and development companies.*
2. *Priority will be given to employment types for which there is a recognised lack of employment land which could restrict the continued growth of the Cambridge Cluster.*
3. *A new Masterplan for the further development of the Cambridge Science Park will be prepared in conjunction with the Masterplan for the development of Cambridge Northern Fringe (East)*

Matter SC7 – Building a Strong and Competitive Economy

Sub-Matter SC7A.3 Policy E/1B: Cambridge Biomedical Campus Extension

Representation Number: 66121

Representation Identification: 20942

Examination in Public of the SCDC Submitted Local Plan 2013

Written Statement from Cambridge Past, Present & Future

25th November, 2016

Matter SC7 Building a Strong and Competitive Economy
SC7A.3 Policy E/1B: Cambridge Biomedical Campus Extension
Representation 66121

(This issue will only be debated in the event that the Council decides to submit this allocation)

Issue i.:

Could the exceptional circumstances necessary to release land from the Green Belt be demonstrated in relation to the Campus extension development?

- In its objection to the extension, CambridgePPF has argued that the exceptional circumstances have not been demonstrated.
- It is easy to argue in general terms that the research conducted on the Campus is not only important for the future economic growth of Cambridge in the bio-tech sector but also has the potential to be of benefit to society as a whole in terms of public health – and that these satisfy the requirement for ‘exceptional circumstances’. However, moving from the general to the specific, it is difficult to justify why a company has such an overwhelming need to be located on the Campus that its operations would be seriously compromised if forced to re-locate to another science park nearby. The ‘public health benefit’ is an argument that cannot be substantiated as the exceptional circumstance, especially when the rationale for recent corporate re-locations are examined in detail.
- If the extension was allowed to proceed, there must be a policy requirement that all companies wishing to locate onto the Campus be rigorously screened. Because of the likely demand by biotech companies to have an operation on the Addenbrooke’s Bio-Medical Campus for reasons of corporate prestige, together with the limited area proposed for development, it is essential that any company wishing to locate must demonstrate unambiguously its over-riding necessity to be sited on the Campus as opposed to elsewhere in the Cambridge vicinity, and to show what contribution it will make to the research cluster on the Campus. Companies wishing to locate onto the Campus more for vanity than for research reasons should be excluded.
- To implement this policy, CambridgePPF believes that all potential relocations must be rigorously screened. Such screening is of such importance that it cannot be delegated to the landowner/developer or just to market forces, and needs to be part of the planning process. We would extend this principle of screening new companies to any strategically important site within the city, not just to the Green Belt.

Issue ii.:

Would the development of the site have an adverse effect on biodiversity in this location?

- Yes, it inevitably would have an adverse impact. The South-West corner of the extension would run to within 40m of the boundary of the Nine Wells Nature Reserve. This obviously must be a major consideration in determining the use of the site. The Reserve was registered as an SSSI on account of its fresh-water ecology, particularly certain rare species of flatworm and caddis-fly, but was downgraded in 1976 because of the impact of drought and water abstraction on its hydrology. The hydrology is important not only to the ecology of the site but also to secure the source of the flow in Hobson’s Conduit, an important heritage feature of Cambridge. The ecological status of the reserve is now degraded and the nominated invertebrate species have disappeared.
- If the extension was to be allowed, a pre-condition must be included in Policy E/1B that the developer of the land accepts responsibility for the restoration of the degraded state of the Reserve to an ecological condition comparable to that pertaining before it was downgraded from SSSI status. Furthermore, this pre-condition must include a responsibility by the developer to maintain this restored conservation status of the Reserve in perpetuity. The restoration and maintenance of the Reserve will require a level of funding beyond the capacity of any conservation organisation so it is realistic to look to the developer as the source of such funds.

- Because of the fundamental nature of this pre-condition, CambridgePPF argues that it must be incorporated into Policy E/1B rather than left to a S106 Agreement so that developers understand from the onset the responsibility they will be taking on.

Issue iii.:

Can surface water flooding issues be satisfactorily addressed?

- CambridgePPF is not in a position to address the issue of surface water management but it does offer some relevant observations on the hydrology of the site.
- The surface water drainage must not interfere with the hydrology of the Nine Wells Reserve. The reason for its ecologically impoverished condition is the lowering of the water-table. The Reserve protects the principal source of Hobson's Conduit, an important element in the City's historic environment – if the water flow was to fail, it would be a serious blow to Cambridge. The sustainable drainage of the extension could perhaps augment the water-flow in the Conduit.
- However the Reserve itself must be shielded from ingress of surface water from the extension to avoid any possibility of contamination, and a reliable flow of groundwater from the south into the springs must be restored – for which outline plans are already in preparation. Implementation of such plans will require funding which should form part of the conservation funding referred to under Issue ii. above

Issue iv.:

Could the transport impacts which would arise as a consequence of the development of the site be satisfactorily mitigated?

- The increased traffic generated by the development will over-load an already congested road system. CambridgePPF has already argued that the resolution of this problem cannot be addressed at the local level through some form of traffic management plan. The congestion issue is so widespread across the City that it must be addressed at the City level through radical measures like a congestion charge.
- Unless effective measures to alleviate congestion are introduced now, the continued growth and prosperity of Cambridge will suffer. The Addenbrooke's extension will be just exacerbate an already urgent problem. There comes a point where just going on and on with more and more development produces such gridlock that Cambridge will jeopardise its own future.

Issue vi.:

Would the site be of sufficient size to meet the demands of bio-medical and healthcare research in this locality?

- With the likely success of the Addenbrooke's Campus, there will always be the demand for more land to accommodate the demand for more companies to re-locate. Hence, CambridgePPF's call for rigorous screening. In our opinion, there is adequate land available to meet foreseeable needs provided the land is allocated in the best practical way. We therefore believe that the Campus must up-date its now out-of-date 2020 Vision with a new masterplan to show the future full extent of the site and its limitations. There is opportunity for well managed infilling where land is wasted through surface car parking.

Changes to the Plan:

- CambridgePPF proposes that a new Paragraph 2 of Policy E/1B is included as follows:
"2. Companies or institutes wishing to re-locate onto the Addenbrooke's Campus must provide clear and compelling evidence as to why they must be located on the Campus, and why their operations cannot be pursued satisfactorily on a site nearby. Merely operating in the bio-medical sector will not satisfy such evidence which must show that the company or institute can work effectively only if it has immediate access to the facilities and research opportunities offered by the Addenbrooke's Campus, and makes a direct contribution to the research profile of the Campus.

- CambridgePPF proposes that the existing Paragraph 2 of Policy E/1B be re-written as Paragraph 3 as follows:

“a. - b. Current

c. Undertake the full ecological restoration of the Nine Wells Local Nature Reserve to the same ecological condition as pertained before its downgrading from SSSI status, including the re-introduction of those rare species lost to the site as a consequence of its ecological degradation, and maintain the Reserve in its enhanced condition in perpetuity through the development of a water management system that will maintain the water level and purity of the Nine Wells Reserve and protect the headwaters of Hobson’s Conduit.

d. - j. Current

k. Prepare an updated Masterplan of the whole Campus showing how the limited space is allocated to achieve the greatest possible land use for biomedical and biotechnological research and development

Matter SC7 – Building a Strong and Competitive Economy

Sub-Matter SC7G Policy E/7: Fulbourn and Ida Darwin Hospitals

Representation Number: 58934

Representation Identification: 20942

Examination in Public of the SCDC Submitted Local Plan 2013

Written Statement from Cambridge Past, Present & Future

25th November, 2016

Matter SC7 Building a Strong and Competitive Economy
SC7G Policy E/7: Fulbourn and Ida Darwin Hospitals
Representation 58934

Issue i.:

Would the proposed green wedge on the western part of the Ida Darwin Hospital site be of sufficient size to effectively prevent the merging of Cherry Hinton and Fulbourn or should it be expanded to the east?

- The outline plan for the redevelopment of the Ida Darwin Hospital shows the 'green wedge' as comprising a strip of undeveloped land at the western end of the site. Its effectiveness in preventing the merging of the villages will depend on its width. Because of the intrusion of the North-East corner of Capital Park, its effective width will inevitably be restricted at its narrowest point. Leaving approximately one-third of the site undeveloped as the wedge would provide a width at its narrowest point of little more than the length of a football pitch. The suggestion, as implied in Policy E/7, that this would be adequate to prevent the merging of Cherry Hinton and Fulbourn is risible.
- Some 250-275 new dwellings are proposed on the western boundary of Fulbourn (Paragraph 8.28). This scale of development will not only have a pronounced impact on the village, its services and facilities, but will inevitably erode the already narrow section of Green Belt separating Fulbourn from Cherry Hinton.
- The 2015 Cambridge Inner Green Belt Boundary Study reviewed the importance of the Green Belt in this area (Sector Number 13.2 – Land North of Cambridge Road). It stated that "this sector plays a key role in the setting of the south-east of Cambridge.... it also prevents the continued sprawl of Cambridge to the south east.....it plays a key role in the remaining separation between Cambridge and Fulbourn...." In other words, this sector is of high value in preventing Fulbourn becoming assimilated into an expanding Cambridge and in maintaining the individuality of the village. Siting a high density residential development at the narrowest point of the separation is contrary to the purposes of the Cambridge Green Belt. The Council has endorsed the 2015 Review, so presumably it agrees the importance of protecting the Green Belt in this area.
- CambridgePPF therefore argues that the width of the wedge should be expanded if it is to be effective. Expansion westwards is not possible because of Fulbourn hospital and Capital Park, so the only solution is to move the western edge of the redevelopment to the East approximately to the line proposed for the main access off Fulbourn Old Drift. This would produce a separation between Cherry Hinton and Fulbourn at its narrowest point of about one field's width. CambridgePPF would regard this as the minimum for effective separation.
- In addition, Policy E/7 must conform to Paragraph 89 of the NPPF. The 6th bullet-point states that the redeveloped of previously developed sites in the Green Belt can be exempted from the restriction on development in the Green Belt provided such redevelopment "would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development." Consistency with this requirement must be made clear in the policy. The redevelopment should not reduce the openness of the existing landscape. It is difficult to see how the provision of 250 new dwellings on the eastern part of the site can be made compatible with the requirement to maintain the openness of the landscape...
- As the supporting text of Policy E/7 states (paragraph 8.29), the site is characterised by landscaped grounds of open parkland with a low density of buildings, generating a feeling of openness. This must be retained, according to the NPPF, in its redevelopment. This could best be achieved by a redevelopment that occupies the same footprint with the new buildings of the same height and massing as the existing buildings on the eastern half of the site. This is recognised in paragraph 8.27 which talks of 'redevelopment of the built footprint in a different configuration as a residential area...' Again, this point needs clarification in the policy.

- Paragraph 2 of Policy E/7 talks of ‘a compensatory enhancement to the openness of the Green Belt in this location’. What does this mean? The NPPF makes no allowance for ‘compensatory enhancements’ in the Green Belt. CambridgePPF rejects the concept that an area can be developed at a high density if an adjacent area is left under-developed as compensation. This statement is inconsistent with the NPPF and should be removed from Policy E/7.
- Policy E/7 implies that the Council views the Ida Darwin site as the redevelopment of a previously developed site in the Green Belt, in which case conformity with paragraph 89 of the NPPF is required. However, the outline plans for the implementation of Policy E/7 suggest a higher density development on the eastern half of the site that substantially exceeds the footprint of the current buildings. This could imply that the Council regards the Ida Darwin development as a new site in the Green Belt rather than as a brownfield redevelopment. If this is the case, then conformity with paragraph 83 of the NPPF is required. However, the Council fails completely to even address the necessity to demonstrate the ‘exceptional circumstances’ required by the NPPF for new Green Belt development.
- It is unclear at the moment which buildings are to be retained for medical use by the Cambridge & Peterborough Mental Health Foundation Trust, and which will be available for residential redevelopment. A comprehensive masterplan of the whole locality is needed showing the scale and massing of the redevelopment and the size of the green wedge.

Proposed Changes to the Plan:

- Policy E/7 should be amended as follows:
 1. *The redevelopment of the existing buildings of the Ida Darwin Hospital will be permitted provided such redevelopment is confined to the footprint, scale and massing of the existing buildings and does not have a greater impact on the openness of the Green Belt, and on the purposes of including land in the Green Belt, than the existing development. The site may be redeveloped to a different use configuration with residential development on the eastern part of the site where current medical use may be transferred to new medical facilities at the Fulbourn Hospital site.*
 2. *Redevelopment will provide a green wedge on the western part of the Ida Darwin site linking the areas of open countryside to the north and south of Fulbourn Old Drift. This wedge must be of a sufficient width to provide an effective barrier to the merging of Cherry Hinton with Fulbourn by allowing a strip of open Green Belt to separate the two villages. This wedge will maintain the openness of the Green Belt in this location and will provide enhanced public access to the countryside.*
 3. *An SPD should be developed by the Council for the location, including the Fulbourn Hospital Conservation Area, showing which buildings will be retained for medical use, which will be transferred to the Fulbourn Hospital and thus become available for housing redevelopment, and the location and size of the green wedge.*

Matter SC7 – Building a Strong and Competitive Economy

Sub-Matter SC7P Policy E/19: Tourist Facilities and Visitor Attraction

Representation Number: 58941

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**Matter SC7 Building a Strong and Competitive Economy
SC7P Policy E/19: Tourist Facilities and Visitor Attraction
Representation 58941**

Issue iv.:

Could the Council clarify the purpose and intention of criterion (f)?

- Paragraph f. of the policy is unnecessarily restrictive. Certain types of rural visitor attractions may need on-site staff accommodation for their effective operation.
- CambridgePPF, in common with other land-owning non-governmental organisations, owns areas of land that are managed for nature conservation and public recreation – Country Parks, Nature Reserves, and the like. These may require staff to be permanently on-site, typically through the presence of a Warden or Ranger both for conservation land management and to ensure public health and safety, to discourage inappropriate behaviour by the public, and to ensure that stock gates are closed and car-parking gates are locked at night. The mixture of livestock, children, and dogs can lead to incidents where public safety can be compromised so a permanent staff member on site is essential.
- CambridgePPF accepts the principle that creating a rural visitor attraction should not automatically allow for the spurious provision of staff accommodation on-site when such staff are not essential for the effective operating of the facility. But an absolute ban is unwarranted – some measure of flexibility is required.

Proposed Change to the Plan:

- The words “*(excluding accommodation)*” in the introductory paragraph should be removed.
- Paragraph f. of Policy E/29 should be amended as follows:
“The proposal does not require on-site accommodation unless it can be shown that staff accommodation is essential for the effective operation of the facility.”