

24 January 2025

Subject: Draft CBC Supplementary Planning Document (SPD)

From: Cambridge Biomedical Campus Ltd

Purpose: To provide comments to Greater Cambridge Shared Planning Service (GCSP) on the draft CBC Supplementary Planning Document (SPD)

Appendices:
APPENDIX 1: GCSP Policy Extracts

Related papers:
None

Summary:

This document is the formal response from CBC Ltd to the consultation by Greater Cambridge Shared Planning Service (GCSP) on the draft Supplementary Planning Document (SPD) for Cambridge Biomedical Campus.

The contents have been agreed by the Directors of CBC Ltd.

Individual member organisations may also respond direct to GCSP on this consultation.

Overall CBC Ltd are supportive of the SPG and its purpose.

CBC Ltd agree with the structure of the SPG and the majority of the content.

There are however areas where CBC Ltd would like to suggest changes, alterations or additions. These are set out in the 'substantive comments' section of this consultation response. Where possible comments are structured around the contents of the chapters and page/para numbers for the draft SPD.

Substantive Comments from CBC Ltd

Foreword and Chapter 1 Introduction and Purpose

1. No comments

Chapter 2: Ambitions for the Campus and development to date

1. The chapter broadly gives an accurate account of the development of the campus since 1962. There is however scope for confusion about the history and which organisations led which pieces of work at what points.
2. Para 2.1 – In order re-enforce the separation between landowners and occupiers represented by CBCL we suggest splitting this paragraph into two (para 2.1 and new para 2.2) one describing land ownership and one describing campus occupants some of whom came together to form CBC Ltd in 2021. A high-level map of landownership would also be helpful.
3. Para 2.2 – refers to the development of the Addenbrookes led ‘Vision 2020’. It says it was 1st produced in 2001 and updated in 2004. However, at para 2.6 there is reference to the vision being updated in 2010. The dates referring to initial publication and subsequent updates should be consistent between 2.1 and 2.6 ie Vision 2020 was first published in 1999 and formally revised in 2004.
4. Any reference to updates to the 2020 Vision in 2010 should be omitted.
5. Para 2.6 reference to Vision 2020 should make it clear that this document was commissioned and led by CUH.
6. At para 2.9 there is extensive reference to the more recent CBC Ltd led Vision 2050 which was published in 2021 and updated in 2024. There is potential for further confusion for readers as to the content of this new Vision 2050 (produced by CBC Ltd) and Local Plan evidence submissions which seek to justify further campus expansion phase 4 (currently led by the landowners). As drafted the SPD suggests Vision 2050 was part of the evidence submitted in support of expansion. Please make it clear that the Vision 2050 was not produced to support the Landowners proposals for inclusion in the new Local Plan.

Chapter 3: Site Context

1. There a number of minor typo and other changes which can be picked up separately. There are no substantially inaccurate or misleading statements that need correcting.

Chapter 4: CBC Development Principles

1. The six themes and principles contained within them are welcome. They are consistent with a range of issues which CBC Ltd has argued need to be addressed across the campus as it develops.
2. While these principles are welcome there are some areas where the wording could be stronger or further requirements added.
3. Para 4a 1.4: This addresses the ‘Multi-Purpose Role of Open Spaces’ and the SPD suggests that new open spaces should be designed to support their flexible use eg for events and meanwhile uses. This is welcome but CBC Ltd believe this could be strengthened by specific reference to meanwhile use and the need to provide access to power and water in and around these spaces. This would help facilitate the desired flexibility
4. Additionally the SPD should include a requirement for the provision of:

- i) an incubator facility with subsidised/affordable lab space for start-ups.
- iii) a hotel.

5. Provision of these uses on the campus would complement its core purpose and would cement its ability to attract and retain world global investment and talent

Justification:

6. i) Incubator - the requirement to secure incubation space at affordable rates for start-up life science businesses sits firmly within the context of existing 2018 adopted plan policy for both the City and South Cambridgeshire (See extracts at APPENDIX 1).
7. It is well evidenced from successful innovation districts and clusters that the ability to support early stage/start-up enterprises is critical to the success of campuses such CBC. Realising a full-scale innovation ecosystem is an essential element of the world class life sciences offer that is desired at CBC. The SPD should be seeking the provision of such a space.
8. In recent correspondence with the Treasury CBC Ltd stated:

'Further, it is widely accepted that there is acute need in the early stage start up and scale up category of space which the market fails to bring forward. This is why the campus is particularly focused on increasing the incubation facilities to maximise the opportunity for the UK that co-locating incubation with the institutions clustered on campus can bring.'
9. This is also supported in the evidence report GCSP commissioned from Icen. 'Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs'. Particularly recommendation Vi a, b and c on page 5 which directly supports the range of provision that an incubator would deliver (see APPENDIX 1).
10. The need for affordable incubation space is referred to in both the CBC Vision 2050 (updaed 2024) but also through the support of the Cambridgeshire and Peterborough Combined Authority (CPCA). Support for an incubator is being considered as part of the CPCA Growth Plan being submitted to Government.
11. In terms of the scale of the incubator requirement, CBC Ltd research has found that there is a need on campus for 20,000sqft of incubator floorspace. This should be provided within one of the buildings on those parts of the Phase 2 and 3 land which are yet to be developed. Delivery including construction and subsidised rent levels should be secured by contributions from all the commercial life science schemes that come forward on this land.
12. ii) Hotel – CBC Ltd believe that a hotel use would be a key element of a successful campus environment and the SPD should encourage its provision. This would:
 - Strengthen international connections and the attractiveness of the campus to Foreign Direct Investment (FDI).
 - Provide a much-needed additional amenity to support the campus offer.
 - make the most of the Cambridge South Railway Station.
 - also provide potential accommodation for friends and families of those being treated within the health services on campus.

- could include conferencing facilities for those using the hotel and the campus more generally and would be complementary to such a facility serving the Eastern region.
13. The requirements for the provision of an incubator and hotel can be achieved through the addition of further text reflecting these asks in the Delivery section of the principles eg after para 4.f 2.3.
 14. New para 4.f.2.4:
'Seek to support a world class campus through the requirement to provide or contribute to the inclusion of an incubator facility (20,000 sqft) and an hotel.'

Chapter 5: Obligations and mitigation

1. CBC Ltd would like to see the requirement for the provision of an incubator facility and hotel on the campus included here.
2. Under the section on built form on page 43 additional bullets should be added regarding the provision of these facilities as follows:
 - "Does the proposal either provide in its entirety or make a material contribution to the provision of an incubator facility on the campus?"
 - "Does the proposal either provide in its entirety or make a material contribution in some way to the provision of a hotel facility on the campus?"

ENDS

APPENDIX 1: Relevant policy wording from Polciy 17 the adopted 2018 plans:

a) Cambridge City:

Policy 17: Cambridge Biomedical Campus (including Addenbrooke's Hospital)

Area of Major Change Development proposals will be permitted at Cambridge Biomedical Campus (including Addenbrooke's Hospital) where it can be demonstrated that development is required to meet local, regional or national health care needs or for biomedical and biotechnology research and development activities within class B1(b), related higher education and sui generis medical research institutes.

Associated support activities for the site as a whole, including a hotel, seminar conference centre and small scale A1 (local shop), A3 (café), A4 (public house) and D1 (crèche) type uses, would be acceptable to meet the needs of employees and visitors and to add to the vibrancy of the area

b) South Cambridgeshire

Policy E/2: Cambridge Biomedical Campus Extension

An extension to the Cambridge Biomedical Campus will be supported on land shown on the Policies Map for biomedical and biotechnology research and development within class B1(b) and related higher education and sui-generis medical research institutes.

8.16 The Cambridge Biomedical Campus (CBC) is an international centre of excellence for patient care, biomedical research and healthcare education. It plays a local, regional and national role in providing medical facilities and medical research. *The local plan will support its continuing development as such, and as a high quality, legible and sustainable campus. It also reinforces the existing biomedical and biotechnology cluster in the Cambridge area.*

c) GCSP Icen Report Extract:

vi. Looking ahead, Greater Cambridge has a pivotal role to play on the national and international scale in life science and tech evolution but will need to enhance its offer to support its existing ecosystem and continue to compete on the national and international scale. Key priorities emerging from this work are:

- a) Prioritising 'place based' business destinations for life science and ICT that offer: high quality modern work spaces; preferably form part of a larger cluster / community to enable knowledge exchange; are in attractive settings; offer a range of amenities including food and beverage; and are well served by public transport as well as car. Urban and edge of urban locations are advantaged in their connectivity to workforce and amenities, whereas rural settings whilst offering attractive environments

typically have greater connectivity challenges. ICT occupiers enjoy park based settings but equally may thrive in 'downtown' locations such as CB1 that are less a part of a defined knowledge cluster, their office premises requirements tending to be better suited to urban environments than labs and more amenity / accessibly node orientated.

b) Recognising that even Greater Cambridge's most successful life science locations such as Cambridge Biomedical Cluster and Cambridge Science Park will need to evolve to provide best-in-class occupier place based destinations that can offer the full range of commercial accommodation, facilities and amenities.

c) Seeking to provide a range of premises in terms of scale, ensuring that smaller start-up and scale-ups are provided for. Start-up / scale-up provision is considered to function best in the supported campus environment rather than in isolation; and starts ups in supported institutional environments. Mechanisms to ensure diverse scale provision in part may be through an improved overall supply which is already emerging.

Exploring the feasibility of commuted sums contributions for start-up provision is recommended.