

South Cambridgeshire
District Council
&
Cambridge City Council

Statement of Case

The Cambridge South East Transport Scheme Order

Application under the Transport and Works Act (1992)

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1. Executive Summary

- 1.1. The Local Planning Authorities of South Cambridgeshire District Council (SCDC) and Cambridge City Council (CCiC) (jointly 'the Councils') established a shared planning service (known as Greater Cambridge Shared Planning Service (GCSP)) in 2018 to discharge their obligations under the Town and Country Planning Acts. This Statement of Case is submitted by the shared planning service on behalf of the said Councils in response to the application made for The Cambridge Southeast Transport Scheme Order under the Transport and Works Act (1992). This follows on from the Councils' joint representation submitted to the consultation dated 7 March 2025.
- 1.2. This application for the Cambridge South East Transport Scheme Order was submitted by Cambridgeshire County Council (CCoC) on behalf of the Greater Cambridge Partnership (GCP). The purpose of the application is to authorise works and purchase of land for implementation of Phase 2 of the Cambridge South East Transport project; namely to allow the construction, operation and maintenance of a guided busway between Cambridge Biomedical Campus at the southern end of Francis Crick Avenue in Cambridge and a new Travel Hub facility at the A1307/A11/A505 road junction southeast of the village of Babraham.
- 1.3. The Councils' representation, Statement of Case and participation in the public inquiry are made in their role as local authorities for the administrative areas in which the proposal is located. The majority of the proposed development lies within the SCDC administrative boundary, including the majority of the off-road route, bus stops and the Travel Hub. The works within CCiC administrative area are limited to the on-road route, cycle way and associated landscaping along Francis Crick Avenue and the roundabout with Addenbrooke's Road. This statement provides an assessment of the scheme's compliance with relevant policies of both local planning authorities' development plans for works within or affecting their respective administrative boundaries, along with national planning policy and other material considerations.

- 1.4. On the basis of the application documents submitted, the Councils have no objection to the principle of development, having regard to the need case and the benefits of the scheme in terms of reducing congestion and pollution, improving connectivity and sustainable transport modes, and supporting economic growth and planned housing within Greater Cambridge. The scheme is necessary for the successful delivery of planned development for significant areas of growth on allocated sites, including the Cambridge Biomedical Campus (SCLP 2018 policy E/2 and CLP 2018 policy 17) and Granta Park (SCLP 2018 policy E/15). The proposals therefore support the delivery of the spatial development strategy contained within the SCLP 2018 and CLP 2018. Moreover, the transport benefits of the proposals support the expansion of the Cambridge Biomedical Campus, science and innovation-based enterprises in locations to the South of Cambridge, and the wider economic and housing growth identified in the emerging Greater Cambridge Joint Local Plan.
- 1.5. Nonetheless, the Councils' consultation response on the application dated 7 March 2025 raised several matters requiring further consideration prior to determination of the application. This statement provides an update on discussions that have been undertaken with the applicant since submission of the representation. In summary, the Councils are not currently satisfied that the application details submitted are sufficient to mitigate as far as possible, the environmental effects arising from the development as required by the Council's adopted development plans. Further information is therefore requested to assess the impacts to enable measures to be implemented to reduce avoidable impacts and secure appropriate mitigation. This is covered in detail in this statement, but in summary relates to the ecological impact of construction and operational phases, impact on protected species, securing the provision of biodiversity net gain, and the retention of trees important to mitigate the landscape and visual impact.
- 1.6. In addition to this, the Councils highlight several areas for further engagement with the applicant in order to secure high-quality development which achieves the strategic aims of the scheme. This includes further engagement on design matters to reflect comments made about connectivity, accessibility, landscape,

trees and sustainability. The Councils believe these to be capable of being resolved through continuing engagement to agree the Design Principles document which would guide the discharge of detailed design conditions, and to agree a set of planning conditions. While proposed conditions were previously shared with the Councils during the pre-application process, amendments are proposed by the Councils, as outlined in this statement. The Councils expect the final wording of conditions to be agreed in a Statement of Common Ground with the applicant.

- 1.7. The Councils remain committed to collaborating with the applicant and other stakeholders to achieve a scheme that balances infrastructure needs to support growth, with environmental and community priorities.

2. Background

- 2.1. The Greater Cambridge Partnership (GCP) was established under the Greater Cambridge City Deal, signed with the Government on 19 June 2014. SCDC and CCiC are part of five local partners which make up the GCP, alongside CCoC, the Cambridgeshire and Peterborough Combined Authority and the University of Cambridge. The aims of the GCP are to support sustainable economic growth, improve transport infrastructure, and deliver housing and skills initiatives across the Greater Cambridge area.
- 2.2. As a result, the Councils have two distinct roles in relation to the proposed scheme. As members of the GCP Executive Board, the Councils have voting rights on decisions related to the commissioning of projects funded by money provided through the City Deal. Separately, the Councils are statutory consultees for the application as local authorities for the administrative areas in which the scheme is proposed, pursuant to sections 10 and 11 of the Transport and Works Act 1992 and rules 21 and 23 of the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006/1466.
- 2.3. The Councils submitted a joint representation to the formal consultation on the application dated 7 March 2025. This representation raised several matters

which have not been resolved to the Councils' satisfaction. The Councils requested that these matters are resolved before the application is determined to ensure that adequate assessment has been carried out and appropriate mitigation measures have been identified and secured through any consent granted. Since then, the Councils have engaged in further discussions with the applicant and have reviewed responses and further information. This statement provides an update on these matters. The Councils' updated position on the issues raised in their representation are summarised in the table below.

Table 1: Update on Councils' position on the issues raised in their representation

Issue raised in representation	Update on Councils' position
1. Analysis of the scheme's alignment with the Cambridge South Station, East West Rail and Sawston Greenway schemes.	<p>This matter is still being discussed with the applicant and the Councils anticipate being able to provide an update before the commencement of the inquiry.</p> <p>See further discussions in paragraphs 11.5 - 11.6.</p>
2. Updated ecology surveys, and resulting assessment and identification of mitigation measures.	<p>This matter is still being discussed with the applicant and the Councils anticipate being able to provide an update before the commencement of the inquiry.</p> <p>See further discussion in paragraph 9.5.</p>
3. Further consideration of the construction impact on Hobson's Brook and Nine Wells Local Nature Reserve, and consideration of alternative proposals and/or mitigation measures.	<p>The applicant has informally responded. This matter is still being discussed with the applicant and the Councils anticipate being able to provide an update before the commencement of the inquiry.</p> <p>See paragraphs 9.14 – 9.18.</p>

4. Further assessment of the operational impact on Hobson's Brook, and consideration of alternative proposals and/or mitigation measures.	<p>The applicant has informally responded. This matter is still being discussed with the applicant and the Councils anticipate being able to provide an update before the commencement of the inquiry.</p> <p>See paragraphs 9.14 – 9.18.</p>
5. Further scrutiny of Biodiversity Net Gain calculations and confirmation of how long-term management and maintenance arrangements will be secured.	<p>Calculations have been provided and reviewed by the Councils. The Councils are continuing discussions with the applicant.</p> <p>See paragraphs 9.21 – 9.23.</p>
6. Further consideration and assessment of construction and operational lighting.	<p>Matter is still being discussed with the applicant.</p> <p>See paragraphs 9.7 – 9.9.</p>
7. Further clarification on Landscape Visual Impact Assessment.	<p>Matter is still being discussed with the applicant.</p> <p>See paragraph 7.10.</p>
8. Clarification on the retention of a tree within the Travel Hub.	<p>Matter is still being discussed with the applicant.</p> <p>See paragraph 10.4.</p>
9. Agreement on Design Principles to guide detailed design matters.	<p>See detailed comments provided throughout this statement. To be progressed with the applicant through the preparation and submission of a Statement of Common Ground.</p>
10. Agreement on planning conditions to secure appropriate mitigation.	<p>See detailed comments provided throughout this statement and summarised in section 19 of this statement. To be progressed with the applicant through the preparation and submission of a Statement of Common Ground.</p>

3. Policy and Legal Context

Development plan and adopted documents

3.1. The adopted development plans for the two administrative areas are the South Cambridgeshire Local Plan 2018 and the Cambridge Local Plan 2018. The relevant policies are:

South Cambridgeshire Local Plan 2018:

- Policy S/2: Objectives of the Local Plan
- Policy S/3: Presumption in Favour of Sustainable Development
- Policy S/4: Cambridge Green Belt
- Policy S/5 Provision of New Jobs and Homes
- Policy S/6 The Development Strategy to 2031
- Policy S/7: Development Frameworks
- Policy S/12: Phasing, Delivery and Monitoring
- Policy CC/1: Mitigation and Adaptation to Climate Change
- Policy CC/3: Renewable and Low Carbon Energy in New Developments
- Policy CC/4: Water Efficiency
- Policy CC/6: Construction Methods
- Policy CC/7: Water Quality
- Policy CC/8: Sustainable Drainage Systems
- Policy CC/9: Managing Flood Risk
- Policy HQ/1: Design Principles
- Policy HQ/2: Public Art and New Development
- Policy NH/2: Protecting and Enhancing Landscape Character
- Policy NH/3: Protecting Agricultural Land
- Policy NH/4: Biodiversity
- Policy NH/5: Sites of Biodiversity or Geological Importance
- Policy NH/8: Mitigating the Impact of Development in and adjoining the Green Belt
- Policy NH/14: Heritage Assets
- Policy SC/2: Health Impact Assessment
- Policy SC/9: Lighting Proposals
- Policy SC/10: Noise Pollution
- Policy SC/11: Contaminated Land
- Policy SC/12: Air Quality
- Policy SC/14: Odour and Other Fugitive Emissions to Air
- Policy E/2: Cambridge Biomedical Campus

- Policy E/15: Established Employment Areas
- Policy TI/2: Planning for Sustainable Travel
- Policy TI/3: Parking Provision
- Policy TI/7: Lord's Bridge Radio Telescope

Cambridge Local Plan 2018:

- Policy 1: The presumption in favour of sustainable development
- Policy 2: Spatial Strategy for the location of employment development
- Policy 3: Spatial strategy for the location of residential development
- Policy 4: The Cambridge Green Belt
- Policy 5: Strategic transport and infrastructure
- Policy 8: Setting of the city
- Policy 14: Areas of Major Change and Opportunity Areas – general principles
- Policy 17: Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change
- Policy 27: Site specific development opportunities
- Policy 28: Carbon reduction, community energy networks, sustainable design and construction, and water use
- Policy 29: Renewable and low carbon energy generation
- Policy 31: Integrated water management and the water cycle
- Policy 32: Flood risk
- Policy 33: Contaminated Land
- Policy 34: Light pollution control
- Policy 35: Protection of human health and quality of life from noise and vibration
- Policy 36: Air quality, odour and dust
- Policy 39: Mullard Radio Astronomy Observatory, Lord's Bridge
- Policy 55: Responding to context
- Policy 56: Creating successful places
- Policy 57: Designing new buildings
- Policy 59: Designing landscape and the public realm
- Policy 61: Conservation and enhancement of Cambridge's historic environment
- Policy 65: Visual pollution
- Policy 69: Protection of sites of biodiversity and geodiversity importance
- Policy 70: Protection of priority species and habitats
- Policy 71: Trees
- Policy 80: Supporting sustainable access to development
- Policy 81: Mitigating the transport impact of development
- Policy 82: Parking management
- Policy 85 Infrastructure Delivery

3.2. Relevant supplementary planning documents (SPDs) are:

- Cambridge Biomedical Campus SPD (adopted April 2025);
- Greater Cambridge Sustainable Design and Construction SPD (adopted 2020);
- Greater Cambridge Biodiversity SPD (adopted 2022)
- Cambridgeshire Flood and Water SPD (adopted 2018);
- Cambridge Southern Fringe Area Action Plan (AAP) (adopted 2008)
- Cambridge East AAP (2008)
- Sawston Village Design Guide SPD (adopted 2020)
- Listed Buildings in South Cambridgeshire SPD (adopted 2009)
- Cambridge City Council's Public Art SPD (adopted 2010)
- Cambridge City Council's Planning Obligation's Strategy SPD (adopted 2010)
- District Design Guide SPD (2010)

3.3. Also relevant:

- Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted 2021)
- The Local Transport and Connectivity Plan (LTCP) – Adopted November 2023
- The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) – Adopted March 2014
- Cambridge & Peterborough Combined Authority (CPCA) Bus Strategy (2023)

National planning law, policy and guidance

- National Planning Policy Framework (NPPF) (2024)
- Planning Practice Guidance
- National Design Guide 2021
- Local Transport Note 1/20 (LTN 1/20) Cycle Infrastructure Design
- Circular 11/95 (Conditions, Annex A)
- Environment Act 2021
- EIA Directives and Regulations - European Union legislation with regard to environmental assessment and the UK's planning regime remains unchanged despite it leaving the European Union on 31 January 2020
- Conservation of Habitats and Species Regulations 2017
- ODPM Circular 06/2005 – Protected Species
- Equalities Act 2010

Emerging Greater Cambridge Local Plan

- 3.4. The Councils are preparing a joint Greater Cambridge Local Plan (GCLP) for their combined areas. Following consultation on Issues and Options First Conversation (Regulation 18) in 2020, the Councils consulted on a First Proposals Preferred Options (Regulation 18) in 2021. Since then, progress has been delayed by external factors beyond the Councils' control, in particular the identification of uncertainties surrounding water supply.
- 3.5. The First Proposals 2021 set out a Vision for the GCLP and a series of aims set around the following key themes:
- Climate change
 - Biodiversity and green spaces
 - Wellbeing and social inclusion
 - Great Places
 - Jobs
 - Homes
 - Infrastructure
- 3.6. The Councils agreed a new Local Development Scheme in January 2025 that shows public consultation on a Draft GCLP (Regulation 18) in Autumn/Winter 2025. The Proposed Submission (Regulation 19) GCLP will be published for consultation in Summer/Autumn 2026 with Submission in December 2026, consistent with the transitional arrangements for plans under the current system alongside the draft NPPF in December 2024.
- 3.7. The new Standard Method calculation published by the government results in an annual Local Housing Need for Greater Cambridge of 2,272 homes per annum (based on data as at March 2025). Cambridge's economic growth, centred upon the City's international significance as a location for academic excellence and innovation (a report by Dealroom shows that Cambridge is, for its size, the most innovative city in the UK and Europe, and is ranked 4th globally) means that the emerging Local Plan, in line with Para 85 –87 of the NPPF 2025, is also planning to meet a forecast increase in employment of over 66,000 jobs by 2045. A significant proportion of that growth is forecast to be in life sciences, for which the Cambridge Biomedical Campus is the foremost location within the UK and is one of the leading global innovation clusters globally.

3.8. In addition, the spatial development strategy set out in the most recent consultation in 2021 includes a number of additional strategic scale sites to meet the needs of the area, in particular directing development to where it has the least climate impact, where active and public transport is the natural choice (page 39), including:

- Policy S/CBC - a further allocation at the Biomedical Campus to continue to meet local, regional or national health care needs or for biomedical and biotechnology research and development activities, related higher education and sui generis medical research institutes, associated support activities to meet the needs of employees and visitors, as well as residential uses for affordable and key worker homes for campus employees.
- Policy S/BRC - an allocation at Babraham Research Campus.
- Policy S/GC - an allocation at Welcome Genome Campus.

4. Need Case

4.1. The CSET scheme directly addresses the objectives of the adopted and emerging development plans for Cambridge and South Cambridgeshire, and the local transport policy framework for the area south of Cambridge that supports these. CSET will deliver one of the schemes identified in the adopted Local Transport Plan to directly support locally, regionally and nationally important growth in this area, including at the Cambridge Biomedical Campus (CBC), Babraham Research Institute and Granta Park. CSET is supported in principle by the policy framework set out as follows.

4.2. The adopted and emerging development plans identify significant areas of growth in the area south of Cambridge including the CBC. CLP 2018 policy 17 allocates the Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change for development required to meet local, regional or national health care needs or for biomedical and biotechnology research and development activities, related higher education and other medical research institutes, with associated support activities. South Cambridgeshire Local Plan 2018 includes a site allocation for the Cambridge Biomedical Campus Extension

within policy E/2 to support the site's continuing development, alongside enabling further development at Granta Park (SCLP 2018 policy E/15).

- 4.3. The importance of supporting growth of the allocated sites with public transport and sustainable travel options to promote a modal shift away from private car use is recognised in the Cambridgeshire County Council Transport Strategy for Cambridge and South Cambridgeshire (2014), which supported the adopted development plans. The strategy identified the Haverhill to Cambridge Corridor as one of seven major corridor programme areas. It highlighted the cluster of research and knowledge-based sites (Granta Park, the Babraham Research Campus and nearby at the Genome Campus) within close proximity to each other, and the role of Cambridge as a regional centre for employment, retail and primary healthcare for people living in Haverhill. The Strategy recognised the problem of congestion on the A1307 which slows journeys for cars and buses and highlighted the significant potential for this to worsen with development at Granta Park, Babraham Research Campus and Haverhill.
- 4.4. The 2014 Strategy aimed to create a high-quality public transport corridor which offers a real alternative to using the private car for trips between Haverhill and Cambridge. Due to the lack of rail service, bus services were the focus for public transport within the corridor. A busway/high quality passenger transport corridor and an additional Park and Ride site was planned in the longer-term. The proposed CSET scheme - providing a segregated off-road busway and Travel Hub - would therefore meet the objectives within the 2014 Strategy.
- 4.5. The adopted Local Plan policies reflect the 2014 Strategy. In addition, CLP 2018 policy 17 referred to above supports measures to enhance access to the campus including for cyclists, pedestrians, wheelchair users and other disabled people, and mitigate the impact on the existing road network and parking in the surrounding area. It also supports provision for the extension of existing conventional bus services, busways and Park and Ride services to meet the needs of the resident and working populations, including disabled people. SCLP 2018 policy E/2 referred to above requires measures to enhance access to and within the Cambridge Biomedical Campus including provision for cyclists,

pedestrians, wheelchair users and people with other disabilities, and mitigate impacts on the wider road network and parking in the surrounding area.

- 4.6. The Cambridgeshire and Peterborough Combined Authority Local Transport and Connectivity Plan (LTCP) 2023 – identifies six goals: productivity (including supporting housing and employment growth); connectivity; climate; environment; health; and safety. The Councils consider that the CSET scheme directly addresses each of these goals. The LTCP 2023 in its strategies for specific local areas (page 16 section titled ‘Local Projects: East – The Biotech Corridor and towards Newmarket and Haverhill’) identifies CSET, alongside the other GCP corridor schemes, as essential to linking the growing communities along the Haverhill-Cambridge corridor. Beyond this, the LTCP identifies CSET’s role, alongside Cambridge South Station, in catering for the significant number of people who will be working at CBC, and linking the campus to other major employment sites along the A1307 corridor towards Haverhill, including Babraham Research Campus and Granta Park. The Transport Assessment for the Cambridge South Station undertaken for The Network Rail (Cambridge South Infrastructure Enhancements) Order (Environmental Statement Volume 3: Environmental Statement Appendix 17.2) identified CSET alongside other planned transport improvements and interventions predicted to result in a potential decrease in vehicular traffic on the CBC and road network, supporting more people to use public transport to travel to and from the station.
- 4.7. The emerging Greater Cambridge Local Plan (as set out in the First Proposals 2021 consultation) identifies a further significant allocation at the Biomedical Campus (Policy S/CBC). Ongoing work by the LPA in concert with the site promoters indicates that the proposals could increase the potential number of jobs hosted on the biomedical campus from 23,000 currently to around 40,000 by 2050. Consistent with the sectoral clustering centred around the Cambridge Biomedical Campus, the Emerging Local Plan also envisages continuing growth at Granta Park (67,000 sqm) and the Wellcome Genome Campus and new growth at Babraham Research Campus (Policy S/BRC), alongside committed employment development at Sawston, which together could provide around a further 17,000 new jobs linked to life sciences into the local economy over the

next 20+ years, alongside population growth estimated at an additional 140,000 residents by 2045 across the Greater Cambridge area.

- 4.8. The emerging Local Plan allocation at CBC (Policy S/CBC) within the First Proposals referred to above identifies that delivery of further growth is dependent on ensuring that the level of vehicle trips is limited to an appropriate level for the surrounding road network. The Transport Evidence Report supporting the First Proposals assumed delivery of CSET, alongside Cambridge South Station, as the central mitigation enabling this. The CSET scheme accordingly makes an important contribution towards reducing dependency on private car by providing a high quality public transport and active travel route into CBC and the internationally significant campus's to the South of the City that will continue to experience growth in their workforce with a corresponding increase in trips to work from within and beyond Cambridgeshire.
- 4.9. Building upon the emerging Greater Cambridge Local Plan First Proposals, GCSP commissioned Icen Projects Limited to prepare a report on 'Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs' (September 2024). The report, based upon a detailed examination of the sectors needs and requirements, emphasises the importance of good public transport, connectivity and place-making to underpin the areas continued growth from the 41,000 jobs already present between CBC and the Wellcome campus south of the City (Cambridge Cluster Insights & Analysis / Wellcome To Cambridge Biomedical Campus). As a scheme identified in the up-to-date Local Transport Plan, the CSET scheme accordingly makes an important contribution to meeting the local and national objectives for growth.
- 4.10. In 'The Case for Cambridge' published by the previous Government in March 2024 the then Secretary of State sets out the importance of Cambridge as a leading centre of science and innovation and its contribution to the UK economy. The Cambridge Delivery Group (now consolidated into the Cambridge Growth Company) was established to focus on enabling and accelerating key developments that align with the overall strategy for growing the urban area of Cambridge and spreading the benefits to the wider region. Alongside the "Case

for Cambridge” in a Written Ministerial Statement on 8 May 2024, the Secretary of State for Levelling Up Housing and Communities indicated “...the national importance of the greater Cambridge life sciences sector is sufficient to prompt, in principle, the early expansion and coherent delivery of this foremost UK life sciences cluster. In particular, the Government is satisfied that the imperative to support this key sector provides sufficient justification for immediate collaboration between key stakeholders on development proposals coming forward ahead of the emerging local plan, to address the coherent enhancement, intensification and expansion of the Cambridge biomedical campus adjacent to Addenbrooke’s Hospital.” In this context the Councils would like to highlight the written expression of strong support for the scheme received from the directors of the Cambridge Biomedical Campus Ltd (CBCL) and the chair of the CBC Travel and Transport Group (TTG).

- 4.11. In summary, the Councils consider that the CSET scheme would play an essential part in realising the adopted and emerging development plan policy objectives outlined above and will also support the national economic ambitions of the Government for the Cambridge area.

5. Green Belt

- 5.1. The proposed development is located within the Cambridge Green Belt, except for the section within the CBC. The proposal has been assessed against the requirements of the National Planning Policy Framework (NPPF) 2024, SCLP 2018 policy S/4, CLP 2018 policy 4 and other material considerations.
- 5.2. The NPPF advises that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness (NPPF 2024, paragraph 153). It confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in "very special circumstances", where the potential harm to the Green Belt is clearly outweighed by other considerations (NPPF 2024, paragraph 153). The Planning Statement and Consideration of Green Belt Issues Reports (2021 and 2024) consider two

scenarios: firstly, whether the proposal is inappropriate development; and secondly, if the development is considered to be inappropriate development, whether “very special circumstances exist”. The Council considers these below.

Inappropriate development

- 5.3. The applicant puts forward the case that the proposal is not inappropriate development within the Green Belt because it is ‘local transport infrastructure which can demonstrate a requirement for a Green Belt location’, which is one of the exemptions from inappropriate development listed in paragraph 154 (NPPF 2024). The applicant refers to the need for the development and goes on to explain that, as Cambridge is surrounded by Green Belt, it would not be possible for a new off-road public transport route and Travel Hub to be provided without a Green Belt location in some form. This is accepted. It then summarises the studies and workshops undertaken to develop a single preferred option for the route alignment and location of the Travel Hub. Some locations outside the Green Belt were considered for the Travel Hub, however the applicant explains how the preferred location meets the strategic objectives. This is accepted. For these reasons, the Councils agree that the proposal demonstrates a requirement for a Green Belt location.
- 5.4. In addition to this, the exemption in paragraph 154 requires that the development must preserve the openness of the Green Belt and not conflict with the purposes of including land within it. The applicant provides a detailed assessment against these two requirements with reference to the purposes of the Green Belt set out in national policy (NPPF 2024, paragraph 143) and policy S/4 in the SCLP 2018. The applicant’s Consideration of Green Belt Issues Reports (2021 and 2024) conclude that the degree of harm to the Green Belt from the proposed development - in terms of both openness and conflict with the purposes of the Green Belt - would be between Moderate to Moderate-minor to Minor with the mitigation of appropriate planting and when assessed in the context of the surrounding environment. The study concluded that openness would not be preserved, and that there would be conflict with Green Belt purposes. On this basis, the proposal would be considered inappropriate development.

- 5.5. The applicant's assessment in the Consideration of Green Belt Issues (2024) considers the impact of individual elements of the scheme on the openness and purposes of the Green Belt within different sectors. It concludes that the various proposed stops, the Travel Hub and bridges along the route would reduce the openness of the Green Belt and therefore fail to preserve openness. It also concludes that the proposed route between Granham's Road and the River Granta and the stops proposed at Great Shelford and Stapleford would have some conflict with purpose of the Green Belt. The harm resulting from the bus stops has been assessed as Minor and from the River Granta bridges as Moderate-minor. This is accepted.
- 5.6. The impact of the Travel Hub has been assessed as Moderate, reduced to Moderate-minor following mitigation through landscape planting. The proposed Travel Hub would introduce development into a currently undeveloped area with a permanent visual and spatial effect on the openness of the Green Belt, including proposed building, solar panels and other structures at the Travel Hub site. In addition, the parking areas would introduce hard surfacing, on which large numbers of vehicles would be parked throughout the day, and the requirement for lighting, which would be visible during the day and create new lit areas at night. These details – including the scale and appearance of the Travel Hub building, the extent of solar panels, and the lighting scheme – will be subject to conditions. The Councils support the proposed mitigation approach using layout and landscape planting which would be secured by conditions. Subject to this, the Councils agree with the applicant's assessment that the impact of the Travel Hub would be Moderate-minor following mitigation.
- 5.7. The applicant refers to case law highlighting that the degree of harm is a matter of judgement for the decision-maker. It argues on the basis of PPG2 in relation to the Travel Hub that, where the degree of harm is not considered to be significant enough to 'seriously compromise' the purposes of including land within the Green Belt, then the proposal can be considered as not inappropriate development. The Councils agree with the applicant's assessment of harms, and consider that the proposal and use of conditions will seek to mitigate any

residual harms as far as possible. Subject to that mitigation being secured by conditions, the degree of harm to the Green Belt would be minimised.

- 5.8. Officers agree with the assessment of the moderate, moderate minor and minor degree of harm identified through the applicant's Green Belt assessment.

However, with due regard for paragraph 154 criteria (h)(iii) it is considered that the proposed development would constitute inappropriate development within the Green Belt. This is due to the consequent loss of openness and conflict with Green Belt purposes discussed above, which the Council considers is sufficiently significant to amount to inappropriate development.

Very special circumstances

- 5.9. Notwithstanding the issue of whether the proposal is inappropriate development, the applicant makes the case that "very special circumstances" exist that would justify the scheme regardless of whether it is considered to be inappropriate development. Namely it refers to the need for the busway, as well as a lack of alternative options together with social, environmental and economic benefits which significantly outweighs any harm. The Council agrees that the proposal supports the strategic objectives of the SCLP 2018, the CLP 2018 and the emerging Greater Cambridge Local Plan, as set out in Section 4 of this Statement of Case. These plans prioritize sustainable transport solutions to support planned growth, address existing congestion, and improve access to employment and services, which the proposal would deliver. The application demonstrates that the preferred route and location of the Travel Hub have been robustly assessed, and the proposal requires a Green Belt location to achieve the strategic growth objectives. For these reasons, and subject to the satisfactory resolution of the outstanding matters identified in this statement, the Councils consider that the scheme is capable of demonstrating 'very special circumstances'.

Summary

- 5.10. In summary, the Councils support the applicant's approach to assessing the impact on the Green Belt. The Councils support the applicant's assessment of

the preferred route alignment and Travel Hub location, and therefore agrees that the proposal would be 'local transport infrastructure which can demonstrate a requirement for a Green Belt location'. The Councils concur with the findings of the applicant's assessment of the impact on the openness and purposes of the Green Belt, which identifies some Moderate to Moderate-minor to Minor impacts. Given the permanent spatial and visual impacts to the openness of the Green Belt and the identified conflict with Green Belt purposes the Councils are of the view that the proposal would be inappropriate development, notwithstanding that the degree of harm would be minimised by the proposed mitigation. Given the adopted and emerging development plan policies, which underpin the need for the proposals, the Councils consider that subject to appropriate mitigation to minimise the harm, the proposals are capable of demonstrating that "very special circumstances" exist to justify the development in accordance with paragraph 155 NPPF.

6. Agricultural Land Use

6.1. The proposed development would result in the loss of agricultural land. The elements of the proposal which are washed over by the Green Belt are also subject to Agricultural land classifications (Grade 2 and 3). The proposal has been assessed against the requirements of the NPPF 2024, SCLP 2018 policy NH/3 and other material considerations.

6.2. The agricultural land affected by the proposed development is within SCDC. The following development plan policy is relevant:

6.2.1. SCLP 2018 policy NH/3 'Protecting Agricultural Land' contains criteria for the assessment of development that will lead to the irreversible loss of Grades 1,2 or 3a agricultural land. Planning permission will not be granted on unallocated land unless sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land.

6.3. The NPPF 2024 states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality (Foot 65). The NPPF defines the best and most versatile agricultural land as land in Grades 1, 2 and 3a of Agricultural land classifications.

6.4. Within the planning statement submitted in support of the proposal it is assumed that the proposed development will result in the loss of agricultural land categorised as the best and most versatile. Mitigation has been tabled in the form of a soil management strategy in conjunction with restoration of land temporarily acquired during construction but not required for soft landscaping to its original capability. Within this context, the applicant considers the loss of agricultural carries moderate weight as far as it relates to harm to the Green Belt. This is accepted.

6.5. Policy NH/3 contains a framework for SCDC to support development which results in irreversible loss of Grades 1, 2 or 3a agricultural land subject to satisfying detailed criteria of the said policy. In this instance the Councils are satisfied that the need for the development as set out in Section 4 of this report is sufficient to override the need to protect the agricultural value of the land.

6.6. For this reason, and subject to a condition to secure a soil management strategy, the proposal would satisfy SCLP 2018 policy NH/3 and the NPPF 2024.

7. Landscape

7.1. The majority of the route and associated works are within South Cambridgeshire, however works within the CBC and along Francis Crick Avenue are within Cambridge City. In addition, works adjacent to the boundary will impact on the setting of the city. Therefore, the following policies from both development plans are relevant:

7.1.1. SCLP 2018 policy HQ/1 'Design Principles' requires all development to be high-quality, responsive to its surroundings, and well-integrated with the

existing landscape and built environment. Proposals must respect local character, considering scale, materials, and design, while ensuring integration with existing landscapes, townscape, and public spaces to enhance both visual and functional coherence.

7.1.2. In addition, SCLP 2018 policy NH/2 'Protecting and Enhancing Landscape Character' emphasises the need to conserve and reinforce the distinct landscape character of South Cambridgeshire. SCLP 2018 policy NH/6 'Green Infrastructure' supports the creation, protection, and enhancement of multifunctional green infrastructure.

7.1.3. Specifically related to Green Belt, SCLP 2018 policy NH/8 'Mitigating the Impact of Development in and adjoining the Green Belt' states that developments must not have detrimental impact on rural character and openness of the Green Belt. Development on the edges of settlements surrounded by the Green Belt must include careful landscape design measures of a high-quality.

7.1.4. CLP 2018 policy 55 'Responding to Context' emphasises the need for development to respond positively to features of the natural and historical importance. This is also emphasised in CLP 2018 policy 58 'Creating Successful Places' which requires landscape areas to respond to their context. Furthermore, CLP 2018 policy 59 'Designing Landscape and Public Realm' requires landscape to integrate into the surrounding land.

7.1.5. With regard to the impact of development on the setting of the city, CLP 2018 policy 8 'sets out criteria against which development on the urban edge and within green infrastructure corridors and the Green Belt will be supported. The site allocation policy for the CBC recognises the sensitivity of the site's location on the edge of the city, with CLP 2018 policy 17 'Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change requiring development to respect key views to and from the chalk hills.

- 7.2. The District Design Guide SPD (2010) is also a material consideration and provides a landscape assessment. The scheme is within the Area A 'Chalklands' Local Character Area (LCA) identifies and characterised within the assessment.
- 7.3. The 'Landscape and Visual Impact' (LVIA) chapter 11 of the ES provides an assessment of the proposal on landscape character. It refers to the 'Cambridge South East Transport – Consideration of Green Belt Issues' report submitted by the applicant, which provides an updated landscape character assessment and identifies two landscape character areas (LCAs) that the scheme crosses, namely the Granta Valley LCA and Gog Magog Chalk Hills LCA.
- 7.4. The LVIA chapter assesses a study area extending 2 kilometres from the scheme's red line boundary. A Zone of Theoretical Visibility has also been established within the study area using geographical information systems. The baseline includes a desk study and walkover survey. A series of viewpoints (VPs) have been identified from landscapes considered to be of high amenity value (or to illustrate a specific consideration) and several photomontages prepared. Impacts have been considered in the year of opening (year 1) and year 15 when mitigation provided by planting has matured. The impact of lighting on the character of the landscape and on views experienced by occupiers of residential properties was considered in the assessment and a separate Lighting Impact Assessment has been submitted.
- 7.5. The LVIA identifies Large or Moderate adverse impacts resulting from the proposal during the operational phase on the following LCAs and VPs:
- Granta Valley LCA
 - VP4 Users of National Cycle Route 11 / DNA Cycle Path (PPA / 0155) looking South
 - VP7 Users of National Cycle Network Route 11 / DNA Cycle Path (PPA / 0155) looking North
 - VP8 Residents at White Hill Farm, Nine Wells House and White Hill House, and users of the permissive bridleway looking south-west
 - VP14 Residents on Hinton Way and Coppice Avenue looking north-east
 - VP15 Residents on Mingle Lane, Duke's Meadow and the western end of Gog Magog Way and visitors to St Andrew's Church and Stapleford Cemetery looking north-east

- VP16 Residents on Haverhill Road, Chalk Hill and at the eastern end of Gog Magog Way looking north-east
- VP17 Residents of Middlefield Cottage, South Hill House, the House on the Hill and other residences on Fox Hill and users of Haverhill Road looking south and south-west
- VP19 Users of Bridleway 212 / 2 and residents on Haverhill Road looking east
- VP20 Users of Bridleway 212 / 2 looking west
- VP22 Users of Restricted Byway 12 / 10 and residents of North Farm looking south-west
- VP24 Residents on Babraham Road, Lynton Way and Stanley Webb Close looking east and south-east
- VP25 Users of Footpaths 179 / 1, 179 / 2, 196 / 12 and 196 / 14 looking north-east
- VP26 Users of Sawston Road and the cycleway looking west
- VP30 Users of Footpath 12 / 4 looking south and south-east and Footpath 4 / 3 looking west

7.6. These impacts result variously from the introduction of new transport infrastructure, including the busway, bus stops, river crossings and Travel Hub, as well as operational impacts from moving buses and lighting. Mitigation is proposed by way of a Landscape and Ecological Management Plan and an Operational lighting design to minimise impacts on landscape and visual receptors. These are to be secured via condition. This is supported in landscape terms. The requirements in relation to specific elements of the scheme are considered in more detail below.

7.7. The LVIA also identifies the retention of tree AT025 as one of the landscape mitigation measures. This is discussed in the 'Trees' section of this report.

The temporary impact of the construction phase is also assessed in the LVIA and Large or Moderate adverse impacts are identified on the following:

- Granta Valley LCA
- VP4 Users of National Cycle Route 11 / DNA Cycle Path (PPA / 0155) looking South
- VP6 Visitors to Nine Wells Nature Reserve and users of Footpath 196 / 2 looking west.
- VP7 Users of National Cycle Network Route 11 / DNA Cycle Path (PPA / 0155) looking north
- VP8 Residents at White Hill Farm, Nine Wells House and White Hill House, and users of the permissive bridleway looking south-west.

- VP14 Residents on Hinton Way and Coppice Avenue looking north-east
- VP15 Residents on Mingle Lane, Duke's Meadow and the western end of Gog Magog Way and visitors to St Andrew's Church and Stapleford Cemetery looking north-east
- VP16 Residents on Haverhill Road, Chalk Hill and at the eastern end of Gog Magog Way looking north-east
- VP17 Residents of Middlefield Cottage, South Hill House, the House on the Hill and other residences on Fox Hill and users of Haverhill Road looking south and south-west
- VP19 Users of Bridleway 212 / 2 and residents on Haverhill Road looking east
- VP20 Users of Bridleway 212 / 2 looking west
- VP22 Users of Restricted Byway 12 / 10 and residents of North Farm looking south-west
- VP24 Residents on Babraham Road, Lynton Way and Stanley Webb Close looking east and south-east
- VP25 Users of Footpaths 179 / 1, 179 / 2, 196 / 12 and 196 / 14 looking north-east
- VP26 Users of Sawston Road and the cycleway looking west
- VP27 Users of Footpath 12 / 9 and residents in properties north of Sawston Road looking south
- VP28 Users of Sawston Road and High Street looking east
- VP30 Users of Footpath 12 / 4 looking south and south-east and Footpath 4 / 3 looking west

7.8. These impacts result variously from the introduction of construction works along the route, bus stops, river crossings and Travel Hub, including additional noise and activity, and the presence of site compounds. Mitigation is proposed by way of a condition for approval of a CoCP and CEMP (including a construction lighting plan). These are to be secured via conditions. This is supported.

7.9. The Councils raised in their representation the need for the LVIA to take account of recently completed developments near to the route and the proposed solar canopies at the Travel Hub, to ensure a robust assessment of the scheme. The Councils are awaiting a response before commenting further. However, they consider that the issues raised are unlikely to have a significant impact on the conclusions on the LVIA, although they may require further mitigation to be identified and incorporated into the proposals.

The Councils also raised in their representation the need for further discussions on matters for detailed design of the Travel Hub, the bus stops and along the busway route. The successful integration of the new transport corridor into the

existing landscape and the delivery of successful mitigation and landscape design is dependent on the detailed design and implementation of the project, and future management of the landscape features including soft and hard landscape, careful consideration of the route cross sections, street and site furniture layout and design, bridge and abutment design, and the siting and design of buildings and other structures. Minimising the potential prominence, through careful siting, detail design and landscaping remain important matters capable of being finalised through the conditions and supported by the Design Principles document. This would be an agreed document, and conditions would be worded to require details to be in accordance with the Design Principles document to be agreed with the applicant within the Statement of Common Ground to be submitted. The Councils expect the design principles document will be submitted to the inquiry as an appendix to the statement of common ground to be agreed prior to the Order being made.

- 7.10. Based upon the scheme details provided at this stage, the Councils support this approach, subject to agreement on the detailed wording of the relevant conditions and further discussions to agree the Design Principles document to guide the discharge of planning conditions. The Councils expect to continue to engage on amendments to the Design Principles document guided by the comments below in order to improve the scheme's contribution towards meeting the policy objectives to mitigate the landscape impact of the development within SCLP 2018 policies HQ/1, NH/2, NH/6 and NH/8, and CLP 22018 policies 55, 58, 59, 8 and 17.

Busway

- 7.11. The proposed tree and hedgerow planting should be enhanced to facilitate the integration of the busway into the surrounding landscape and provide ecological and visual benefits. This is particularly in areas where the site boundary extends around new attenuation and ecology ponds, such as those near Nine Wells LNR and the River Granta.
- 7.12. The visualisations show bright and prominent proposed barriers alongside the busway and the emergency and maintenance track, which would accentuate the

impact of the busway on the landscape. Alternative materials should be explored and referenced in the Design Principles document to guide the detailed design and selection of materials.

River crossings

7.13. The Design Principles document should explain how these structures have been designed to integrate into the landscape and contribute to a cohesive identity for the busway across the project, including minimising the structures elevation above existing or made ground levels. Consideration of materials, finishes, and colours should also be included.

7.14. There are potential challenges in establishing planting alongside bridges and other structures due to local ground conditions and dry weather patterns. The Design Principles document should explain the types of planting proposed, particularly the differentiation between reinforced embankments with geotextiles and unreinforced embankments. Details should also be provided on the design of vegetated retaining walls and noise attenuation bunds to demonstrate how these elements will be effectively integrated and planted within the landscape.

Travel Hub

7.15. The Councils consider that the impact of parking areas could be reviewed with further refinements to the tree planting and landscaping proposals. This would improve the visual amenity of the site. Furthermore, the form of Attenuation Ponds 6 and 7 could be reviewed with the potential to enhance both their visual and ecological value as much as possible.

7.16. The landscaping scheme should be developed with a coordinated palette of materials, encompassing both hard and soft landscaping, to establish a clear identity for the Travel Hub and the wider busway. Principles for the details of lighting, signage, electric vehicle charging points, site furniture, fencing, and other boundary treatments should be included.

7.17. The application includes limited information on the Travel Hub building, other than the building footprint as shown on the submitted plans for approval. Further information should be provided to ensure the building footprint is appropriately-sized for the scale and function of the hub. The Design Principles document should include consideration of the form and materials of the building, which should be appropriate to the surrounding environment. Lighting, shelter, and shade should also be considered.

Bus stops

7.18. The examples of street furniture (including shelters and benches) within the submitted Design Principles should be reconsidered to ensure the design is in-keeping with the rural locations of the bus stops and support their integration into the landscape. The visualisations show close-boarded timber acoustic fencing. However, for the reasons outlined in the previous sentence alternative materials should be explored and referenced in the Design Principles document to guide the detailed design and selection of materials.

Summary

7.19. Overall, the Councils raise no objections to the conclusions of the LVIA within the ES and support the proposed mitigation.

7.20. Subject to further discussions to explore the above comments in an agreed Design Principles document and agreement on the wording of relevant conditions and thereby secure appropriate mitigation, the proposal is acceptable in accordance with SCLP 2018 policies HQ/1, NH/2, NH/6 and NH/8, and CLP 22018 policies 55, 58, 59, 8 and 17 in relation to the impact on landscape.

8. Built Heritage

8.1. The majority of heritage assets identified within the study area are within South Cambridgeshire, however two assets are identified within Cambridge City. Therefore, the following policies from both development plans are relevant:

8.1.1. SCLP 2018 policy NH/14 'Heritage Assets' sets out the framework for the protection, conservation, and enhancement of heritage assets within the district. The policy ensures that designated and non-designated heritage assets, including listed buildings, conservation areas, scheduled monuments, and historic landscapes, are safeguarded from inappropriate development.

8.1.2. Similarly, CLP 2018 policy 61 'Conservation and enhancement of Cambridge's historic environment' provides the framework for the conservation and enhancement of Cambridge's historic environment. This policy requires that development proposals preserve or enhance the significance of heritage assets, including their setting and wider townscape, and ensure that any harm is fully justified and outweighed by public benefits.

8.2. The NPPF (2024) places great weight on the conservation of designated heritage assets, noting that the more important the asset, the greater the weight should be (paragraph 212). The significance of non-designated heritage assets should also be taken into account, and a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 216). The NPPF sets out the considerations for assessing proposals resulting in substantial and less than substantial harm.

8.3. The ES study area extends to 1.5 kilometres from the site boundary for important designated heritage assets (including Grade I and II* Listed Buildings and Scheduled Monuments). The study area includes all other heritage assets (including Grade II Listed buildings) within 1 kilometre of the site boundary. The survey identified the following built heritage assets of medium or high importance:

- Nine Wells Monument Grade II listed – within 30 metres to the east
- Granham's Farm Group Grade II listed – 350 – 540 metres to the south
- Northern Stapleford Group Grade II listed - 700 / 630 / 350 metres to the west
- Middlefield and Garden Wall Grade II* listed - 320 metres to the northeast
- Stapleford Conservation Area – 450 metres to the west

- Church of St Andrew Grade II* listed – 750 metres to the west
- Church Farmhouse Grade II listed – 280 metres to the north
- Babraham Hall, The Institute of Animal Biology Grade II listed – 900 metres to the northeast
- Sawston Hall Grade I listed – 1 kilometre to the west

The heritage assessment within the ES has not concluded any significant impacts during the operational and construction stages on any built heritage assets identified through the scoping process. The assessment is confident that there will be no perceptible difference to noise and light levels and that the scheme will only be glimpsed as additional noise, light and movement within the countryside. These impacts are considered negligible and not significant in terms of the impact on the significance of built heritage assets.

8.4. The Council agrees with the conclusions of the ES in relation to the impact on Heritage assets. This negligible impact will equate to harm and great weight should be given to the asset's conservation irrespective of the level of harm (NPPF 2024 paragraph 213). The level of harm is considered less than substantial and at the low end of the scale. The NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (NPPF 2024 paragraph 215). This is considered in the planning balance within the conclusion to this Statement of Case.

8.5. The ES identifies mitigation through a construction lighting plan, and implementation of noise and vibration measures to be secured via condition. It also recommends a Heritage Mitigation Plan including any additional mitigation in the form of advance planting or screening to reduce visual intrusion on the setting of nearby buildings. However, as currently proposed, the wording of the condition only requires the Heritage Mitigation Plan to be submitted to the County Archaeologist for approval in relation to archaeological assets. The Councils consider that – in-line with the mitigation identified in the ES - the plan must also relate to built heritage assets and therefore must also be reviewed by the GCSP Historic Environment Team. The wording of the condition must be updated to reflect this.

- 8.6. Subject to an appropriately worded condition to secure acceptable mitigation, the proposal is acceptable in accordance with SCLP 2018 policy NH/14 and CLP 2018 policy 61. Nonetheless, the proposal would result in less than substantial harm to heritage assets, which must be weighed against the public benefits of the proposal in accordance with the NPPF 2024.

9. Biodiversity and Ecology

- 9.1. The proposed works have the potential to impact on habitats and species within both South Cambridgeshire and Cambridge City. The study area identifies designated sites within both administrative areas. Therefore, the following policies from both development plans are relevant:

9.1.1. SCLP 2018 policy NH/4 'Biodiversity' requires that all development proposals maintain, restore, and enhance biodiversity within the district. The policy requires that projects achieve no net loss of biodiversity and, where possible, contribute to a net gain, reinforcing the importance of ecological sustainability. Any potential negative impacts on priority species and habitats must be avoided, and where this is not feasible, the mitigation hierarchy should be applied—prioritising avoidance, followed by mitigation, and as a last resort, compensation for biodiversity losses.

9.1.2. Similarly, SCLP 2018 policy NH/5 'Sites of Biodiversity or Geological Importance' ensures that development does not result in an unacceptable adverse impact on designated sites. This includes Sites of Special Scientific Interest (SSSI), County Wildlife Sites (CWS), and Local Nature Reserves (LNR), all of which are crucial for preserving the region's ecological integrity.

9.1.3. SCLP 2018 policy CC/7 'Water Quality' requires all development to demonstrate that the quality of ground, surface or water bodies will not be harmed, and opportunities have been explored and taken for improvements to water quality; and appropriate consideration is given to sources of pollution, and appropriate Sustainable Drainage Systems

(SuDS) measures incorporated to protect water quality from polluted surface water runoff.

9.1.4. CLP 2018 policy 69 'Protection of Sites of Biodiversity and Geodiversity importance' states that development will be permitted if it will not have an adverse impact on part or all of an identified site of biodiversity importance. Proposals must minimise harm, secure mitigation and enhance the nature conservation value of the site, among other factors.

9.1.5. CLP 2018 policy 70 'Protection of Priority Species and Habitats' states that development will be permitted which protects and enhances priority species and habitats. Proposals that harm or disturb priority species and habitats must minimise harm and secure mitigation, resulting in either no net loss or a net gain, with additional requirements for proposals within or adjoining sites housing priority species or habitats and those identified at the national or county-wide level.

9.2. The Greater Cambridge Biodiversity SPD (2022) is also a material consideration.

Impact on protected species

9.3. The 'Biodiversity' chapter of the ES is based on habitat and species surveys provided as appendices. The Councils raised in their representation the acceptability of survey information submitted with the application. With the exception of UK habitats survey carried out in 2024, all other surveys are considered out of date in accordance with best practice contained within the CIEEM advice note. The applicant explains in the ES that access to land within the 2024 survey season was not granted until after the optimum time for undertaking surveys of certain species. The applicant goes on to explain that in the absence of updated surveys a precautionary approach has been taken. Nonetheless, basing the analysis and proposed mitigation on out-of-date surveys is a significant concern. It assumes no change in population of any of the receptor species since the last survey, however most protected species are very dynamic and will move between sites from season to season. As a result, the

Councils are not currently satisfied that the application has demonstrated the proposal would have an acceptable impact on protected species as required by SCLP policy NH/4 and CLP 2018 policy 70.

9.4. Specific concerns in relation to the submitted surveys are as follows:

- Bat surveys - this very long document is a combination of all the bat surveys that have been undertaken since 2019. These have been individually presented with no overall indexing or summarising. This makes it difficult to draw conclusions and identify appropriate mitigation. This document must either be updated and resubmitted to provide an amalgamation of all surveys undertaken and show a clear timeline of methodologies, surveys results and analysis and include all limitations; or a clearer index with reference points to relevant data should be submitted.
- Reptile surveys - the single reptile survey in 2020 had many limitations, including time of year, covid pandemic restrictions, unsuitable weather, some non-optimal times of the day when surveys were conducted, and some of the surveys undertaken outside of optimum periods during the year. This does not provide confidence in the analysis and identified mitigation. In addition, reptile mitigation and breeding bird mitigation can conflict, with breeding bird habitat removal in the winter but reptile habitat removed in the spring and summer. Confidence in the surveys is needed to ensure acceptable mitigation for both species simultaneously during habitat clearance.
- Amphibian surveys - these surveys are out of date and have limitations. The survey undertaken in 2020 was limited by covid pandemic restrictions, and only 14 out of 55 identified water bodies were surveyed in 2019. Temperatures in May 2020 were above average, meaning that small waterbodies were likely to be dry, however, they may be wet during more average years. The limitations on both surveys undertaken in 2019 and 2020 do not provide the required level of confidence in the analysis and identified mitigation.

- Otter surveys – the limitation section of the report states that the information within the document is valid for one year, meaning the information provided in ES is 1.5 to 2 years out of date. There were limitations in access during the 2022 surveys and therefore, the ES has made assumptions about the presence or absence of otter. Otter is protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and afforded the highest level of protection in the UK. Given the acknowledged limitations, this does not provide confidence in the analysis and identified mitigation and must therefore meet the third derogation test of the Regulations. This requires that the impact of the development does not impact on the conservation status of the species.
- Water vole – As above, surveys are out of date and assumptions have been made due to covid pandemic restrictions at the time of survey and access issues. The ES has assumed that water vole are present along the length of the crossing points; however, water voles are a dynamic species that often move burrows and foraging sites according to resources available, therefore, relying on limited data collection from 2022 does not appear sufficient to properly analysis and make decisions regarding likely mitigation requirements. Only one new water vole pond is suggested within the landscape plans, and the population of water voles in that area is low compared to other areas surveyed and with lower impacts when compared to those other areas surveyed. Therefore, the application needs to demonstrate that the single water vole pond (pond 3) in the location identified is sufficient to mitigate the impact on all populations surveyed.
- Fish – analysis is based on Environment Agency Data collected in 2022. While reference is made to the environment agency data on page 144 (footnote 104) there is no accompanying report provided with details of these surveys. This needs to be provided to enable the conclusions to be fully understood.
- Great crested newts – the proposed mitigation does not align with the survey findings. Ponds 1 and 2 are in an area that no great crested newt surveys were undertaken. An HSI was undertaken at Nine Wells LNR approximately 250 metres south of the proposed great crested newt ponds which had an “average

suitability” result, however, no population surveys were undertaken at that location either. Therefore, the applicant should justify how the proposed location of the great crested newt mitigation is appropriate, considering there is no data to suggest that great crested newts are in the area around the proposed ponds 1 and 2. The Councils suggest that a location further south where great crested newts have been found would be more appropriate.

- 9.5. The applicant has informally responded by identifying surveys to be updated. This has been reviewed by the Councils. At the time of writing, this would not fully address the concerns above. The applicant has informally advised that surveys for bat activity, badgers and wintering birds would not be updated. This does not address concerns about the potential impacts to commuting and foraging bats, particularly around the Travel Hub. Nor does it inform appropriate mitigation for bats. The lack of update to the wintering bird survey requires further justification as to the validity of the existing survey data. As a result, the Councils remain of the view that insufficient survey information has been submitted to provide a solid evidence base for analysis and identification of appropriate mitigation as required by SCLP policy NH/4 and CLP 2018 policy 70.
- 9.6. The applicant has submitted a Landscape Ecological Management Plan (LEMP). The status of the submitted LEMP is unclear, as proposed condition 20 requires the detailed ecological design to be informed by the LEMP, while also requiring the LEMP to be submitted for approval. Notwithstanding this, given the limitations of the surveys described above, the mitigation proposed within the submitted LEMP is not considered to be appropriately justified. This may also require changes to the proposed general arrangement and landscape plans, which have been submitted for approval. This must be addressed prior to determination to ensure appropriate mitigation is secured as required by SCLP policy NH/4 and CLP 2018 policy 70. Condition 20 should then be reworded to require a detailed ecological design to be compliant with an approved LEMP.
- 9.7. The Councils raised in their representation concerns about the impact of operational and construction lighting on bats. The proposed compound to the south of Addenbrooke’s Road would have perimeter lighting for security reasons.

This lies directly adjacent to the Nine Wells Local Nature Reserve (LNR) where Noctule and Pipistrelle bats have been recorded foraging and commuting, with Barbastelle bats recorded nearby. This could have more than a minor impact, with a more likely adverse significance. This species is protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the impact must meet the third derivation test of the Regulations. As well as considering alternative locations for the site compound, the Councils request further discussions on the impact on commuting and foraging bats during construction to consider security lighting within compounds, and on a lighting design to suit ecologically sensitive receptors.

- 9.8. In addition, the operational phase will require a sensitive lighting scheme along the route and at the Travel Hub. Barbastelle bats were detected in the area around the Travel Hub. This species is very light-averse and therefore any new lighting in this area will have an impact. Given the very rare status of this species, there would be a minor impact with slight adverse but not significant result. As there will be operational safety and security requirements for the lighting scheme, further discussions are requested on the lighting design to ensure a sensitive lighting scheme can be achieved as much as possible before the application is determined, as this may require changes to the site layout. This must be addressed prior to determination to ensure appropriate mitigation is secured as required by SCLP policy NH/4 and CLP 2018 policy 70.
- 9.9. For the reasons outlined above the Councils are not currently satisfied that the applicant has demonstrated that identified impacts of the proposed development would sit within acceptable tolerances as far as protected species are concerned as required by SCLP policy NH/4 and CLP 2018 policy 70. The Councils require updated survey information, assessment and mitigation measures to be provided for review before further comments can be made.

Impact on designated sites

- 9.10. The 'Biodiversity' chapter within the ES identifies statutory and non-statutory designated sites for nature conservation within a 2 kilometre radius of the site

plus a 30 kilometre radius for SACs with bats as the qualifying feature. It identifies the following sites with a direct or indirect impact:

- Eversden and Wimpole Woods SAC
- Nine Wells LNR
- River Granta CWS
- Shelford – Haverhill disused railway (Pampisford) County Wildlife Site (CWS)
- Hobson's Brook South City Wildlife Site (CiWS)
- Hobson's Brook Mid City Wildlife Site (CiWS)

9.11. In addition, Hobson's Park to the west of the railway line and including land to the south of Addenbrooke's Road is a City Wildlife Site (CWS) since 2023 as a site with breeding bird species and wintering bird species and supporting a population of a nationally scarce plant species, *Torilis arvensis*. Hobson's Park has not been identified in the ES, however, it is within close proximity to the site. The impact of the proposals on Hobson's Park has not been assessed by the applicant. An assessment should be provided to inform any necessary mitigation. Nonetheless, as the proposal does not have a direct impact on Hobson's Park, the Councils consider it likely that appropriate mitigation can be identified and secured through planning conditions.

9.12. The ES assesses the impact of the operational and construction phases of the proposed development on these sites. No significant Large or Moderate adverse impacts are identified, and some slight beneficial, although not significant, impacts are concluded.

9.13. The Councils raised in their representation concerns about the impact on Hobson's Brook and Nine Wells LNR resulting from the construction and operational phases. Hobson's Brook is an Awarded Watercourse to the City Council (but within SCDC administrative area within this location) and a designated chalk stream. It becomes a CiWS once it enters the city boundary. The City Council has been actively engaged in its restoration through the Greater Cambridge Chalk Stream Project. The Nine Wells LNR has the springhead which is the source of the brook. Therefore, construction and operational works within the area of the LNR and the brook have the potential to impact on this important chalk stream.

- 9.14. The proposed construction compound to the north of Hobson's Brook is positioned in close proximity to the Nine Wells LNR and its boundary encompasses the brook on its southern side. A temporary bridge crossing Hobson's Brook is also proposed in a sensitive location where the brook exits the Nine Wells LNR. The brook becomes a CWS approximately 300 metres downstream from the proposed temporary crossing and 175 metres from the boundary of the works and compound. The potential for debris and runoff from the construction compound and the temporary crossing entering the brook poses a significant risk of pollution during construction. Page 160 table 10.7 of the ES notes the use of "best practice mitigation" will be sufficient mitigation, however, this does not provide confidence that the potential impacts have been properly considered.
- 9.15. The Councils request further information on whether alternative locations have been considered for the construction compound in areas further away from Hobson's Brook to mitigate the potential environmental risks. If an alternative location is not possible, then the site compound boundary must be set back from Hobson's Brook, excluding the brook's banks and allowing sufficient easement to maintain access and wildlife corridor. Further discussions are also required on the detailed wording of an appropriate condition to secure surface water drainage mitigation measures to avoid pollution entering the brook during construction.
- 9.16. During the operational phase, the proposed Attenuation Pond 1 and Ecology Pond to the south of Hobson's Brook would be in close proximity to the Nine Wells springhead. The location of these ponds may influence groundwater levels, potentially affecting the Nine Wells springhead and subsequently the flow of the brook. This would affect the ecological value of this important chalk stream. In addition, as groundwater levels are relatively high in this location, safeguards must be put in place to make sure that no pollutants will enter the groundwater system. The Councils request further assessment of the impact of the ponds on groundwater levels, flow into the brook and the potential for pollutants to enter the brook to be carried out. The Councils request that the

ponds are repositioned further from the Nine Wells springhead and Hobson's Brook to avoid any potential issues.

9.17. Therefore, the Councils are not currently satisfied that the application has demonstrated the proposal would have an acceptable impact on sites of ecological importance as required by SCLP policy NH/5 and CLP 2018 policy 69, or that the proposal would not harm the quality of ground or surface water as required by SCLP 2018 policy CC/7. The Councils require further information, assessment and mitigation measures to be provided for review before further comments can be made.

Biodiversity Net Gain

9.18. As an application made under the Transport and Works Act (1992), the scheme is not legally required to provide mandatory 10 per cent biodiversity net gain (BNG). However, the applicant has committed to delivering 20 per cent net gain across all its projects, including CSET. This is in-line with the NPPF (2024) which emphasises the need for developments to protect and enhance biodiversity and geodiversity, ensuring that projects contribute to a measurable biodiversity net gain rather than relying solely on mitigation. This approach is supported and aligns with SCLP 2018 policy NH/4, CLP 2018 policy 70, the Greater Cambridge Biodiversity SPD (2022), which seek to protect and enhance biodiversity by ensuring that development results in a net gain for nature.

9.19. The applicant has submitted a BNG assessment in support of the application and the GCP's commitments. The assessment concludes that the proposal is predicted to result in a net gain of approximately 50 per cent for Area Habitat Biodiversity Units and a net gain of approximately 98 per cent for Hedgerow Units. This exceeds the target 20 per cent. However net gain for other habitat units would be below this: the predicted net gain for Watercourses (River/Stream and Ditches combined) would be just below 10 per cent. The application states that Watercourse credits would need to be purchased to achieve a 20 per cent target. It is not clear in the application where these credits would be purchased from, however, it is understood that the GCP is developing a programme-wide

strategy which includes securing offsite Watercourse credits. The Councils expect more information to be available on this strategy before the public inquiry and for this to be agreed in a Statement of Common Ground.

9.20. In their representation, the Councils requested copies of the data to validate the calculations. These have been informally provided and reviewed by the Councils' ecology officer. While there are some errors in the validity of the metric which the Councils have asked the applicant to update before the public inquiry starts, these are unlikely to have a significant impact on the conclusions of the assessment that the proposal would achieve a net gain in biodiversity as required by SCLP 2018 policy NH/4, CLP 2018 policy 70, the Greater Cambridge Biodiversity SPD (2022) and the relevant provisions of the NPPF (2024), notwithstanding that there is no mandatory requirement to achieve a minimum net gain percentage.

The provision of BNG would be secured by proposed condition 21 which requires approval of an updated BNG assessment and details of management, maintenance and monitoring arrangements for a 30-year period. The Councils support this approach in principle, however remain concerned that insufficient information has been submitted with the application to demonstrate that ongoing management, maintenance and monitoring can be secured, and therefore that there is a reasonable likelihood that proposed condition 21 discharged, as raised in the Councils' representation.

9.21. Securing ongoing management, maintenance and monitoring would require Section 106 Agreements or Conservation Covenants with the landowner(s) for onsite and offsite provision (which should also secure monitoring costs for the monitoring authority). For onsite provision, it is currently not clear whether the applicant will be the sole landowner or whether agreements are in place with other landowners. For offsite provision of Watercourse credits, as there are currently no registered sites for credits to be purchased within the area, a new Section 106 or Conservation Covenant will need to be entered into with the relevant landowner. Confirmation that these agreements could be concluded

should be provided before the application is determined in order to ensure that there is a reasonable likelihood that proposed condition 21 can be discharged.

9.22. For this reason, the Councils are not currently satisfied that the proposals have demonstrated that they will achieve the applicant's biodiversity net gain commitments consistent with SCLP 2018 policy NH/4, CLP 2018 policy 70, the Greater Cambridge Biodiversity SPD (2022) and the relevant provisions of the NPPF (2024).

10. Trees

10.1. The tree survey identifies trees within South Cambridgeshire and Cambridge City that would be affected by the proposals. Therefore, the following policies from both development plans are relevant:

10.1.1. SCLP 2018 policy HQ/1 'Design Principles' requires new development to preserve or enhance the character of the area and important natural assets. It also requires new development to include high quality landscaping that integrate the development with its surroundings.

10.1.2. SCLP 2018 policy NH/2 'Protecting and Enhancing Landscape Character' requires that development must respect, conserve, and enhance the local landscape character, ensuring that it integrates sensitively with its surroundings.

10.1.3. CLP 2018 policy 71 'Trees' states that development will not be permitted which involves felling, significant surgery (either now or in the foreseeable future) and potential root damage to trees of amenity or other value, unless there are demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity value of the trees. Proposals should preserve, protect and enhance existing trees and hedges that have amenity value as perceived from the public realm; provide appropriate replacement planting, where felling is proved necessary; and provide sufficient space for trees and other vegetation to mature.

10.2. NPPF paragraph 136 of the NPPF seeks to ensure that existing trees are retained wherever possible. The Arboricultural Impact Assessment (AIA) within the ES show that no trees protected by tree preservation orders (TPOs) would be removed, nor ancient or veteran trees. The proposed development would be within the vicinity of some TPOs and tree protection measures must be in place during construction and secured by planning conditions. The AIA identifies some sections of hedgerow to be removed and recommends translocation to a nearby location. This is welcomed.

10.3. The Councils raised in their representation concerns about the potential loss of tree 'AT025' - a mature Oak - within the Travel Hub, which is shown on the submitted tree protection plans. The tree survey identifies this as a category A tree of high value. The tree is located on an existing public right of way (PRoW) to the A11 footbridge, which is to be retained as part of the proposed development. It is therefore highly visible to the public and has high amenity value. The tree survey also identifies possible bat potential. The LVIA chapter of the ES identifies the retention of tree AT025 as one of the mitigation measures. It goes on to state that the detailed design of the Travel Hub should seek to retain the tree if possible, by re-locating the cycle standards, re-aligning the busway, or building the busway on an embankment to minimise excavation. The Council supports this. The submitted AIA should be updated to show the retention of the tree, which should be shown on the plans and within the Design Principles for consistency with the ES.

10.4. The Councils also raised concerns over the potential removal of the plane trees (CT051 to CT077 and CT121 to CT123) on Francis Crick Avenue (FCA) within the CBC and CiCC administrative area. The applicant has since advised that the works affecting FCA are being carried out under permitted development rights and therefore do not form part of the current proposals. The Councils therefore have no further comment to make on this matter for the purposes of the current application, but encourage the applicant to seek the retention, relocation or replacement of these trees in its detailed design for the FCA works.

10.5. Subject to further discussions with the applicant on the retention of Tree AT025, and an appropriately worded condition to secure tree protection measures, the proposal is in accordance with SCLP 2018 policy HQ/1 and NH/2, and CLP 2018 policy 71.

11. Transport and connectivity

11.1. The scheme as a whole would provide a high-quality public transport and active travel route to support access to the south of Cambridge, the Cambridge Biomedical Campus and the wider area, in accordance with the national and local priorities set out in the Detailed Need Case section above.

11.2. Nevertheless, elements of the scheme – the Travel Hub, route and bus stops - are considered in turn below in terms of their connectivity with the surrounding area, and the connectivity within the scheme itself, to achieve an accessible and convenient sustainable travel option. The following policies from both development plans are relevant:

11.2.1. SCLP 2018 policy TI/2 'Planning for Sustainable Travel' requires that developments are designed to reduce car dependency and promote sustainable travel through walking, cycling, and public transport.

11.2.2. Similarly, CLP 2018 policy 80 'Supporting Sustainable Access' to Development supports the prioritisation of access to walking, cycling and public transport.

Travel Hub

11.3. The Travel Hub would have good accessibility for vehicles via a roundabout on the Babraham Road (A1307) close to the junction with the A11. The proposed Travel Hub layout would include the retention of the PRoW through the site. This provides connections westwards to Babraham village (and the major employment centre at the Babraham Research Campus) and eastwards via a pedestrian footbridge over the A11 to The Abingtons (and the major employment

centre at Granta Park) and beyond to Linton and Haverhill. There would be good links to the Linton Greenway (also a GCP scheme) currently nearing construction, and therefore good integration with existing infrastructure to support connectivity with the wider area.

11.4. The Travel Hub would provide car parking (including EV charging and disabled spaces), coach parking and cycle parking, as well as a building providing a waiting area, welfare facilities and shelter. The Councils previously made comments about the proposed layout of the Travel Hub in terms of connectivity within the site and accessibility. Further discussions are required with the applicant at the detailed design stage to redesign the Travel Hub site layout. The Councils encourage the consideration of the following design principles in order to improve the scheme's contribution towards meeting the policy objectives to provide high quality development which prioritises and promotes the use of sustainable transport modes within SCLP 2018 policy TI/2 and CLP 2018 policy 80:

- The movement structure through the Travel Hub site should be reviewed to ensure it is easily accessible for all potential users, including pedestrian, cyclist, public transport, car, and possibly other modes such as scooters.
- The movement structure should also be reviewed to avoid potential conflicts between users and to improve convenience and accessibility where possible.
- The Travel Hub facilities should be reviewed to cater for those travelling both shorter and longer-distances.

Route

11.5. At the northern end, the route is well-connected to existing infrastructure within the Cambridge Biomedical Campus, including the existing Cambridge Guided Busway access to the Cambridge South Station (CSS), the NCN 11 route, the cycle link route to the south of Discovery Drive, and pedestrian and cycle routes within the campus. The Councils raised in their representation the need to

ensure alignment with the CSS scheme in terms of the junction arrangements where the access to the CSS crosses the proposed cycleway. This is to ensure safe entrance and exit into the CSS and to ensure the proposed cycleway is not blocked by waiting vehicles. The applicant has explained that the proposed works along Francis Crick Avenue (FCA) in this location would be carried out under permitted development rights and therefore do not form part of the current proposals. The Councils therefore have no further comment to make on this matter for the purposes of the current application, however encourage the applicant to review this in its detailed design for the FCA works.

- 11.6. The route is also well-connected to the 'DNA' path which runs along the eastern side of the railway line and provides an existing route to Shelford. The proposal seeks to make improvements to the northern section of the DNA path which would be re-routed to use the proposed maintenance access alongside the busway. The DNA path is also part of the Sawston Greenway which provides a route between the CBC and Sawston village (also a GCP scheme). It is understood that the southern part of the DNA path would be improved under this scheme. The Councils raised in their representation the need to ensure alignment between the two schemes in terms of design (for example width, surfacing, wayfinding) and construction (sequencing of the two schemes to ensure minimal disruption to users). The Councils are awaiting a response from the applicant and are unable to make further comment at this stage.

Bus stops

- 11.7. The bus stops are located on the edge of villages and therefore require good pedestrian and cycle connections in order to provide connectivity and encourage the use of sustainable travel modes. The Councils also consider that the layout of the bus stop areas could be improved for accessibility, in particular for users of disabled car parking spaces and cyclists. Further discussions are sought on the detailed design. The Councils propose that the following amendments to the Design Principles should be considered to fully engage with the policy objectives to provide high quality development which prioritises and promotes the use of

sustainable transport modes within SCLP 2018 policy TI/2 and CLP 2018 policy 80:

- The bus stops are connected to the existing footpath networks on the edge of the villages with continuous footpaths on at least one side of the road. This is supported, however, the Council would encourage further consideration of whether further pedestrian crossings near the bus stops could be provided to allow users to cross from the far side to access the bus stops.
- The positioning of crossing points over the busway should be considered further to maximise their effectiveness and safe use.
- The Council would encourage consideration of surfacing materials which provide a clear visual guide to movement priority within the bus stop areas.

11.8. Subject to further discussions with the applicant to explore the comments above and an agreed Design Principles document, the proposal is acceptable in accordance with SCLP 2019 policy TI/2 and CLP 2018 policy 80. Separate comments are made with specific regard to car and cycle parking provision, and accessibility in the sections below.

12. Car and cycle provision

12.1. The proposed car and cycle parking would be within South Cambridgeshire at the Travel Hub and bus stops, however the number of parking spaces available in these locations influences travel modes into Cambridge City. Therefore, the following policies from both development plans are relevant:

12.1.1. SCLP 2018 policy TI/3 'Parking Provision' sets indicative standards for car and cycle parking provision for defined land uses, however emphasises taking a design-led approach to car and cycle parking taking into account the site location, type and mix of uses, and highway and user safety issues, among other factors.

12.1.2. CLP 2018 policy 82 'Parking Management' requires compliance with car and cycle parking standards for defined land uses, however where transport patterns are difficult to generalise, parking provision should be approved on merit, on the basis of a transport assessment.

12.2. NPPF 2024 paragraph 115 emphasises prioritising sustainable transport modes taking account of the vision for the site, the type of development and its location. The design of parking areas and other transport elements should take account of national standards, including the National Design Guide and National Model Design Code.

12.3. Section M3 of the National Design Guide (2021) states that well-designed car and cycle parking should be conveniently sited so that it is well-used, safe and meets the needs of different users. It goes on, well-designed parking is attractive, well-landscaped and sensitively integrated, incorporating green infrastructure, including trees, to soften the visual impact of cars, helping to improve air quality and contributing to biodiversity.

Car parking

12.4. The proposal provides 1,250 car parking spaces at the Travel Hub, including 62 Blue Badge spaces and 62 electric vehicle charging spaces. The bus stops will have drop-off spaces only and parking for Blue Badge holders. This approach is supported to encourage the use of sustainable travel modes to and from the bus stops.

12.5. The number of spaces at the Travel Hub has been calculated from anticipated demand using the occupancy profile for the Babraham Park and Ride site, on the assumption that it will operate in a similar manner to the existing park and ride within the same travel corridor.

12.6. CCoC is the highway authority and responsible for reviewing the impact on the local highway network. The Councils defer to CCoC for their assessment of the proposed number of car parking spaces.

Cycle parking

12.7. The proposal will provide up to 200 cycle parking spaces at the Travel Hub. The number of spaces has been calculated within the Transport Assessment. This will be a combination of Sheffield stands, two-tier racks and lockers. The bus stops would have 40 spaces each. These would be Sheffield stands. No methodology has been provided for how the number of spaces at the bus stopes has been calculated.

12.8. The Councils defer to the CCoC transport assessment team on the acceptability of the Transport Assessment and the number of spaces proposed. The Councils recommend the number of spaces is secured via condition, which would also secure implementation in accordance with agreed Design Principles. Further discussion is required on the wording of an appropriate condition.

12.9. The Council also seeks further discussion on the Design Principles document ensure high-quality cycle parking facilities are brought forward at the detailed design stage to encourage their use and ensure compliance with SCLP 2018 policy TI/3 and CLP 2018 policy 82. The Councils propose the following amendments to the Design Principles document:

12.10. Travel Hub

- The location of cycle parking should be further considered to locate it as close as possible to key points of interchange. There should be clear and safe routes in and out of the Travel Hub for cyclists, which will also help to reduce potential conflicts between cyclists and large pedestrian flows.
- Cycle parking should provide a combination of long-stay and short-stay parking. Long-stay parking should include secure cycle boxes, offering covered, lockable spaces that are suitable for bikes to be kept overnight. Cycle parking should also accommodate a range of bike sizes (such as cargo bikes, hand bikes and tricycles) and a bike maintenance area should also be provided.

- Further clarity is needed on whether the Travel Hub will accommodate cycle/e-bike/e-scooter hire facilities operated by commercial providers. If such facilities are to be included, the parking requirements for hire schemes should be considered and shown on the proposed plans. For example, docked hire schemes typically require bespoke parking spaces and a power supply.

12.11. Bus stops

- The location of cycle parking racks should be further considered to create a secure, spacious, and sheltered facility with the addition of canopies to provide weather protection where possible.

12.12. Subject to further discussions with the applicant to explore the comments above and an agreed Design Principles document, and an appropriately worded condition to secure cycle parking facilities, the proposal is acceptable in accordance with SCLP 2018 policy TI/2 and policy 5 of the CLP 2018.

13. Accessibility and Inclusive Design

13.1. The accessibility and inclusivity of the design is considered for the scheme as a whole. Therefore, the following policies from both development plans are relevant:

13.1.1. SCLP 2018 policy HQ/1 'Design Principles' states that proposals must provide safe and convenient access for all users and abilities to public buildings and spaces, including those with limited mobility or those with impairment such as sight or hearing.

13.1.2. SCLP 2018 policy TI/2 'Planning for Sustainable Travel' requires developments to provide safe and convenient access to public transport, walking, and cycling routes, thereby enhancing accessibility for all residents, including those without access to private vehicles.

- 13.1.3. SCLP 2018 policy TI/3 'Parking Provision' outlines the standards for parking in new developments, emphasising the need for adequate and accessible parking facilities including provisions for people with disabilities.
- 13.1.4. CLP 2018 policy 56 'Creating Successful Places' requires development to be accessible and to meet the principles of inclusive design, in particular to meet the needs of disabled people, the elderly and those with young children.
- 13.1.5. CLP 2018 policy 80 'Supporting Sustainable Access to Development' supports proposals which are accessible and ensure accessibility for those with impaired mobility.
- 13.1.6. CLP 2018 policy 82 'Parking Management' includes requirements for disabled and inclusive parking.

The Councils propose the following amendments to the Design Principles in order to provide high quality development which is accessible for all users and ensure compliance with SCLP 2018 policies HQ/1, TI/2 and TI/3, and CLP 2018 policies 80 and 82:

Travel Hub

- The Design Principles should reference compliance with British Standard BS 8300 for designing accessible and inclusive environments in terms of the detailed design of the Travel Hub and bus stop areas.
- The proposal should promote natural surveillance and include appropriate lighting to enhance personal security. References should be made to compliance with Secured by Design principles where possible.
- A commitment should be made to providing a Changing Places facility within the Travel Hub.

Bus Stops

- The location of Blue Badge parking and the layout of footpaths between these spaces and the bus shelters should be reviewed to minimise conflict for those with reduced mobility and other users.
- The position of crossing points over the busway should be reviewed in relation to the location of Blue Badge parking.
- The Design Principles should include details of surfacing material to provide a clear visual guide to movement priority within the bus stop areas, based on an understanding of the key users at bus stops and other key locations, their movement direction, and frequency.
- The Design Principles should specify bus shelters which accommodate wheelchair users.

13.2. Subject to further discussions and the consideration of amendments to the Design Principles document to reflect the comments above, the Council consider that the proposal would accord with SCLP 2018 policies HQ/1, TI/2 and TI/3, and CLP 2018 policies 56, 80 and 82.

14. Carbon reduction and sustainable design

14.1. The carbon reduction and sustainable design is considered for the scheme as a whole. Therefore, the following policies from both development plans are relevant:

14.1.1. SCLP 2018 policy CC/1 'Mitigation and Adaptation to Climate Change' states that permission will only be granted for proposals that demonstrate and embed the principles of climate change mitigation and adaptation into the development. Applicants must submit a sustainability statement to demonstrate how these principles have been embedded into the development proposal.

14.1.2. SCLP 2018 policy CC/3 'Renewable and Low Carbon Energy in New Developments' states that proposal for new non-residential buildings of 1,000m² or more will be required to reduce carbon emissions by a minimum of 10% through the use of on-site renewable energy and low carbon technologies.

14.1.3. Similarly, CLP 2018 policy 23 'Carbon Reduction, Community Energy Networks, Sustainable Design and Construction, and Water Use' states that all development should take available opportunities to integrate the principles of sustainable design and construction into the proposals. It requires all new development to meet minimum requirements for BREEAM 'excellent' including for on-site carbon reduction.

14.2. The Sustainable Design and Construction SPD (2020) sets out a framework for proposals to demonstrate they have been designed to minimise their carbon footprint, energy and water consumption and to ensure they are capable of responding to climate change to support the development plan policies.

14.3. NPPF 2024 paragraph 163 states that the need to mitigate and adapt to climate change should also be considered in assessing planning applications, taking into account the full range of potential climate change impacts. New developments should help to reduce greenhouse gas emissions and avoid increased vulnerability to the range of impacts arising from climate change (paragraph 164).

Greenhouse Gas Emissions

14.4. The applicant has submitted a Carbon Management Plan. The estimated emissions throughout the construction phase are estimated at 43,234 tCO₂e, which accounts for 0.002 per cent of the UK's fourth carbon budget. During the operational phase, the emissions from energy use for lighting, electric vehicle charging and road user emissions due to change in traffic flows will be partially offset by power generated from the proposed solar canopies at the Travel Hub and carbon sequestration associated with new habitat creation. These operational emissions account for 0.0002 per cent of the UK Fourth Carbon

Budget (2023 to 2027), 0.0007 per cent of the UK Fifth Carbon Budget (2028 to 2032) and 0.0015 per cent of the UK Sixth Carbon Budget (2033 to 2037). This is supported.

14.5. The Carbon Management Plan is intended to be a live document which will be updated through the project life cycle to report on the implemented opportunities and any associated carbon reductions achieved. This approach is welcomed to help identify further opportunities for greenhouse gas emissions reductions throughout the detailed design stage. It is also noted that in relation to reducing operational emissions, reference is made in the Design and Access Statement to fully electric buses being operated on the route at the earliest practicable time. The Councils support this intention.

Climate resilience

14.6. With regards to climate resilience, chapter 15, section 15.4.5 of the ES highlights that the approach utilises the high emissions scenario Representative Concentration Pathways (RCP) 8.5 for the purposes of the assessment, which is an approach that is welcomed. The climate impacts considered include changes in precipitation and resultant flood risk, and damage caused by hotter summers. The Councils consider that further measures should be incorporated at the detailed design stage, for example the use of cool pavements and surfaces which reflect heat to help reduce the risk of changes to the local micro-climate as a result of heat absorption from the busway and maintenance track; and finding opportunities for further tree planting along the route, at bus stops and any rest areas to help provide shelter and comfort during extreme weather events. Consideration must be given to the adaptability of the Travel Hub to future needs. This should be reflected in the agreed Design Principles document.

Water efficiency

14.7. With specific regard to water quality, the relevant policies from both development plans are:

14.7.1. SCLP 2018 policy CC/4 Water Efficiency requires that non-residential buildings to achieve a BREEAM efficiency standard equivalence of 2 credits.

14.7.2. CLP 2018 policy 28 Carbon Reduction, Community Energy Networks, Sustainable Design and Construction, and Water Use requires all new developments to meet minimum standards of water efficiency, setting out the requirement for all non-residential development to achieve full credits for category WAT 01 of BREEAM.

14.8. The consideration of likely significant effects on water resources and flooding is focused on impacts on watercourses and groundwater resources and flood risk. The Councils consider that further measures should be incorporated at the detailed design stage to consider the effects on potable water supply, given the level of water scarcity facing the region and the need for all projects to reduce potable water use. This should consider reducing any water required as part of construction as well as installing water efficient sanitary ware in the toilet block within the Travel Hub and the welfare facilities provided in the construction compound(s). The Councils also recommend for the construction phase that water efficiency is included within the CoCP. The Council recommends that the water efficiency requirement secured through conditions is strengthened to ensure that water efficiency measures are considered for both the construction and operational phases and to seek a minimum of 3 Wat01 credits.

Sustainability Statement

14.9. The proposed conditions do not cover all the policy requirements in the development plans. These requirements include submission of a Sustainability Statement setting out the approach to integrating measures related to both climate change mitigation and adaptation (SCLP 2018 policy CC/1) and specific requirements around renewable energy generation (SCLP 2018 policy CC/3). As such, the Councils recommend an all-encompassing condition for a Sustainability and Carbon Management Plan which would incorporate and replace the wording

of proposed condition on water efficiency (amended to seek a minimum 3 Wat01 credits).

Summary

14.10. Subject to these comments being addressed through appropriately worded planning conditions, the proposal would be in accordance with SCLP 2018 policy CC/1 and CLP 2018 policy 28 and the Greater Cambridge Sustainable Design and Construction SPD (2020).

15. Contaminated Land

15.1. The following policies from both development plans are relevant:

15.1.1. SCLP 2018 policy SC/11 'Contaminated Land' requires that development proposals address land contamination risks, ensuring that sites are safely remediated and suitable for their intended use without unacceptable risks to human health or the environment.

15.1.2. CLP 2018 policy 33 'Contaminated Land' states that development will be permitted where the applicant can demonstrate that ground contamination from existing/previous uses will not have adverse health impacts on the future occupiers, surrounding occupiers, controlled waters or the environment.

15.2. NPPF 2024 paragraph 187 emphasises that planning decisions should enhance the natural and local environment by; (e) preventing new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability; and (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. In this context there exists a framework that enables decision takers to ensure that new development do not contribute to unacceptable risks from contamination.

- 15.3. The Councils are in general agreement with the conclusion in the ES that land contamination is not deemed to give rise to significant effect, subject to securing appropriate mitigation measures detailed within the ES including the Construction Environmental Management Plan and Construction Code of Practice, production of Risk Assessment Method Statements and adoption of Personal Protective Equipment, unexpected contamination protocols, contaminated land watching briefing, and ground gas and vapour assessment at detailed design stage if enclosed buildings are to be included.
- 15.4. Subject to an appropriately worded condition regarding the Construction Environmental Management Plan, the proposal is acceptable in accordance with SCLP 2018 policy SC/11 and CLP 2018 policy 33 in terms of the risks to human health. Risks to controlled waters have not been considered by the Councils. Given the site overlies a Principal Aquifer, the Environment Agency should satisfy itself in respect to the controlled waters risks.

16. Noise Impacts

- 16.1. The construction and operation stages would be within both administrative areas. Therefore, the following policies from both development plans are relevant:
- 16.1.1. SCLP 2018 policy CC/6 'Construction Methods' focuses on mitigating pollution and ensuring that development proposals do not result in unacceptable levels of air, noise, light, or odour pollution.
- 16.1.2. SCLP 2018 policy SC/10 'Noise Pollution' seeks to prevent noise-generating developments from having an unacceptable adverse impact on health and quality of life, ensuring that appropriate mitigation is in place.
- 16.1.3. Specifically, SCLP 2018 policy TI/2 'Planning for Sustainable Travel' emphasises the importance of ensuring that transport proposals minimise adverse impacts on communities and the environment, and effectively mitigate impacts on residential amenity.

16.1.4. CLP 2018 policy 35 'Protection of Human Health and Quality of Life from Noise and Vibration' states that development will be permitted where it is demonstrated that it will not lead to significant adverse effects and impacts on human health and quality of life/amenity from noise and vibration, including cumulative effects, requiring appropriate reduction and/or mitigation to be secured.

16.2. NPPF paragraph 198 emphasises that planning decisions should ensure new development appropriately considers noise impacts. It requires that adverse effects from noise be mitigated and minimized to protect health and quality of life. Developments should avoid significant noise disturbances and safeguard tranquil areas valued for recreation and well-being.

16.3. The noise and vibration assessment shows that the impact of construction on most nearby sensitive receptors will either have negligible or minor adverse effects. Some sites have been identified as having moderate adverse effects, however proposed conditions 4 (Construction Environmental Management Plan) and 22 (Construction Hours) should minimise this impact and reduce the likelihood of complaints arising. During the operational phase, the assessment shows all nearby sensitive receptors will either have negligible or minor adverse effects. The Councils agree with this assessment.

16.4. Subject to the proposed conditions to secure mitigation, the proposal is acceptable in accordance with SCLP 2018 policies CC/6, SC/10 and TI/2, and CLP 2018 policy 35.

17. Air Quality

17.1. The construction stage would be within both administrative areas, and the operational stage would entail buses operating along the route and continuing into the city, thereby affecting air quality in both areas. Therefore, the following policies from both development plans are relevant:

- 17.1.1. SCLP 2018 policy SC/12 Air Quality sets criteria against which proposals will be assessed, including that new development must not lead to significant adverse effects on health, the environment or amenity from emissions to air; and that development will not be permitted where it would adversely affect air quality in an Air Quality Management Area (AQMA) or lead to the declaration of a new AQMA through causing a significant deterioration in local air quality.
- 17.1.2. CLP 2018 policy 36 Air Quality states that development will be permitted where it does not lead to significant adverse effects on health, the environment or amenity. Applicants must demonstrate that there is no adverse impact on air quality in an AQMA or lead to the declaration of a new AQMA.
- 17.2. Officers note that there are currently no AQMAs in either CCiC or SCDC administrative areas.
- 17.3. The operational assessment from potential changes in traffic movements confirms that the increase in nitrogen dioxide levels would be, at worst, negligible at modelled sensitive human receptor locations. A small number of receptor locations were modelled as having a decrease in pollution levels, due to the reduction in vehicle movements along roads as people transition from cars to the guided busway. The air quality model is based on traffic modelling. Should the traffic modelling change, the air quality model may need to be revised to account for these changes.
- 17.4. The submission confirms that in the long-term buses operating on the busway will be fully electric, however, in the short term, hybrid buses will be used. The hybrid buses will operate on a Euro VI diesel engine along the busway, and switch to electric upon entering the CBC. The operation of low / zero emission buses is key in maintaining air quality in the city, particularly given the potential cumulative impact from increased bus numbers from wider development within this part of the city, including the Cambridge to Cambourne Busway. The air quality assessment concludes no significant impacts are predicted within the city using electric buses.

17.5. The Council supports draft planning condition 28. Although, ideally, the buses used should be electric to minimise emissions, the Council recognises that electric buses may not be suitable for the intended daily mileage and the condition ensures that the buses will remain high standard prior to the transition to zero emission vehicles and is therefore supported.

17.6. For these reasons, subject to the proposed planning conditions, the construction and operational phases of the proposed development are acceptable in accordance with SCLP policy SC/12 and CLP 2018 policy 36.

18. Other Matters

Flood Risk

18.1. The following policies from both development plans are relevant:

18.1.1. SCLP 2018 policy CC/9 'Managing Flood Risk' sets out the framework for minimising flood risk and ensuring that new development is resilient to flooding. The policy aligns with national flood risk management strategies and seeks to protect both existing and future communities from the impacts of flooding.

18.1.2. SCLP 2018 policy CC/8 'Sustainable Drainage Systems' sets out the requirements for incorporating Sustainable Drainage Systems (SuDS) into new developments to effectively manage surface water, reduce flood risk, and enhance water quality. The policy ensures that developments contribute to sustainable water management while also delivering biodiversity and amenity benefits.

18.1.3. CLP 2018 policy 32 'Flood Risk' sets out requirements for minimising flood risk to and from the proposed development.

18.1.4. CLP2018 policy 31 'Integrated Water Management and the Water Cycle' sets out requirements for managing surface water close to its source,

prioritising the use of nature services, re-using water as a resource. It supports the use of SuDS and ensuring that such features are multi-functional and make an active contribution to making places for people. The policy also requires any flat roofs to be green or brown.

18.2. CCoC, as the Lead Local Flood Authority (LLFA), is responsible for assessing and managing flood risk across the region. As part of its statutory role, the LLFA ensures that new developments comply with national and local flood risk policies, including the implementation of SuDS and adherence to flood risk management strategies. The LLFA plays a key role in reviewing Flood Risk Assessments (FRAs) and ensuring that developments incorporate appropriate measures to mitigate surface water flooding and enhance climate resilience. The Councils therefore defer to CoCC as the LLFA to consider the flood risk and drainage impacts of the proposals against the above policies.

Transport Impact and Highway Safety

18.3. The proposal intrinsically aligns with the objectives of SCLP 2018 policy TI/2 'Planning for Sustainable Travel' and CLP 2018 policy 80 'Supporting Sustainable Access' by providing public transport, walking, cycling and options, and supports strategies for sustainable growth within the development plans, as set out in the earlier sections of this report.

18.4. Nonetheless, CCoC, as the highway authority, is responsible for overseeing the transport network and ensuring that the scheme meets strategic transport objectives while enhancing connectivity and accessibility for communities. The Councils therefore defer to CCoC to consider the transport and highway safety impacts of the proposals against the above policies.

Archaeology

18.5. The following policies from both development plans are relevant:

18.5.1. SCLP policy NH/14 sets out the framework for the protection, conservation, and enhancement of designated and non-designated heritage assets within the district, including archaeology.

18.5.2. Similarly, CLP 2018 policy 61 ‘Conservation and enhancement of Cambridge’s historic environment’ provides the framework for the conservation and enhancement of Cambridge’s historic environment.

18.6. CCoC, as the local authority responsible for archaeology, assesses and protects archaeological heritage across the region. It ensures that development proposals comply with national and local policies for heritage conservation. As part of its responsibilities, it reviews archaeological assessments, advises on necessary investigations or mitigation measures, and ensures that any significant archaeological remains are recorded, preserved, or appropriately managed before development proceeds.

18.7. The Councils therefore defer to CoCC to consider the impact of the proposals on archaeology against the above relevant policies.

19. Conditions

19.1. The Council acknowledges the extensive discussions held with the Applicant regarding planning conditions and mitigation measures. While significant progress has been made, certain aspects require further refinement to ensure that the proposed mitigation is both robust and effectively secured. **Table 1** below summarises the substantial changes to proposed conditions requested by the Councils. **Table 2** puts forward additional conditions that the Councils consider necessary. This is in addition to minor changes to other conditions to make those conditions useable and enforceable. These measures are considered proportionate, reasonable, and necessary to ensure the Scheme delivers its intended benefits while achieving meaningful environmental and planning betterment. The Councils look forward to further engaging with the Applicant to agree a full set of conditions.

Table 1: Substantial changes to conditions requested by the Councils

Condition 4 – Construction Environmental Management Plan

<ul style="list-style-type: none"> • Code of Construction Practice needs to include water efficiency measures which should seek a minimum of 3 Wat01 credits. • Must secure implementation of contamination mitigation. • production of Risk Assessment Method Statements and adoption of Personal Protective Equipment • unexpected contamination protocols • contaminated land watching briefing, and ground gas • vapour assessment at detailed design stage if enclosed buildings are to be included.
<p>Design conditions</p> <ul style="list-style-type: none"> • Need to reflect the level of detail submitted with the application. The Councils expect the final wording of this condition to be agreed in a Statement of Common Ground with the applicant
<p>Condition 13 – design and external finishing and enclosures</p> <ul style="list-style-type: none"> • Bridges should be included in the text • Reinforced, vegetated structures to be listed in the text
<p>Condition 14 – busway detailed</p> <ul style="list-style-type: none"> • Details of pedestrian and vehicle barriers are required and should be added to the text
<p>Condition 17 – soft and hard landscaping</p> <ul style="list-style-type: none"> • Details of water sources or watering methods during planting operations should be included to make sure that watering is planned for and designed into the scheme. • Information on the proposed colour and material of the tree guards and shelters is required because these will be used in large quantities along the busway and potentially impact on landscape character.

<ul style="list-style-type: none"> Reinforced, vegetated structures to be listed in the text
Condition 18 – 5-Year Landscape Establishment <ul style="list-style-type: none"> This must secure 10-year period rather than 5-year.
Condition 20 – landscape ecological management plan <ul style="list-style-type: none"> The condition is confusing as it requires both compliance with the LEMP and submission of a LEMP for approval. The LEMP must include details and locations of water sources for watering planting during the establishment period. The LEMP must include details of the timing and operations to remove tree and hedge shelters .
Condition 23 – Water Efficiency <ul style="list-style-type: none"> Clarification that this condition relates to operational water use only and does not include construction phase (covered under Code of Construction Practice). Water efficiency measures for both the construction and operational phases should seek a minimum of 3 Wat01 credits

Table 2: Additional conditions

<p>Heritage Mitigation Plan</p> <p>The ES identifies mitigation through submission of a Heritage Mitigation Plan including any mitigation in the form of advance planting or screening to reduce visual intrusion on the setting of nearby buildings. This is not reflected in condition 9 which is limited to archaeology. As such, a</p>

<p>separate condition for approval of a Heritage Mitigation Plan for built heritage assets is required.</p>
<p>Sustainability and Carbon Management Plan</p> <p>The proposed conditions do not cover all of the policy requirements contained in the SCLP 2018 and CLP 2018. These requirements include submission of a Sustainability Statement setting out the approach to integrating measures related to both climate change mitigation and adaptation and specific requirements around renewable energy generation. As such, a new condition for an all-encompassing Sustainability and Carbon Management Plan is required.</p>
<p>Details of cycle parking</p> <p>Further discussion is required on the wording of an appropriate condition that deals with cycle parking as no methodology has been provided for how the number of spaces at the bus stopes has been calculated. The proposal will provide up to 200 cycle parking spaces at the Travel Hub and the bus stops will have 40 spaces each. The Councils will defer to the CCoC transport assessment team on the acceptability of the Transport Assessment and the number of spaces proposed. As such it is recommended that the provision of cycle parking is secured via condition, which would also secure implementation in accordance with agreed Design Principles.</p>
<p>Impact on designated sites Hobson's Park</p> <p>The impact of the proposals on Hobson's Park has not been assessed by the applicant. A condition requiring operational lighting design to minimise impacts to wildlife, landscape and visual receptors is recommended.</p>

20. Conclusion

20.1. On the basis of the assessment within this statement, the Councils consider that the proposed CSET scheme meets the objectives within the Transport Strategy (2014) to create a high-quality passenger transport corridor within the Haverhill to Cambridge cluster of research and knowledge-based sites. The scheme is necessary for the delivery of planned development for significant areas of growth on allocated sites, including the Cambridge Biomedical Campus (SCLP 2018 policy E/2 and CLP 2018 policy 17) and Granta Park (SCLP 2018 policy E/15). The proposal therefore supports the delivery of the spatial development strategy contained within the SCLP 2018, CLP 2018. The project is also central to the delivery of future anticipated growth identified in the emerging Greater Cambridge Local Plan which will play a key part in securing the Governments recently expressed ambitions for the Cambridge area. The Councils accordingly have no objection to the principle of development, having regard to the need case and the benefits of the scheme in terms of reducing congestion and pollution, improving connectivity and sustainable transport modes, and supporting economic growth and planned housing within Greater Cambridge.

20.2. The Councils agree with the applicant's assessment within the ES that the proposal would result in harm to heritage assets. The Councils consider this to be less than substantial harm at the lower end of the spectrum, and acceptable mitigation can be secured by conditions in accordance with SCLP 2018 policy NH/14 and CLP 2018 policy 61. The NPPF 2024 at paragraph 215 requires less than substantial harm to be balanced against the public benefits of the proposal. Strong public benefits have been identified, as set out in this Statement of Case, including that the proposal would provide a high-quality passenger transport corridor and a vital piece of infrastructure to support the delivery of planned development for significant areas of growth (as set out in paragraph 19.2). For these reasons, the public benefits of the proposal should be given great weight, which would outweigh the low harm to heritage assets.

20.3. While acknowledging the collaborative approach of the applicant to-date and the ongoing discussions, currently the Councils are not satisfied that the application

demonstrates acceptable environmental mitigation and further work is required to assess the impacts, reduce avoidable impacts and secure appropriate mitigation. This statement has covered these issues in detail, but in summary these relate to: the ecological impacts of the construction and operational phases, impact on protected species, and securing the provision of BNG as required by SCLP 2018 policies NH/4 and NH/5, CLP 2018 policy 70 and the NPPF (2024); and the retention of trees important to mitigate the landscape and visual impact as required by SCLP 2018 policy HQ/1 and NH/2, and CLP 2018 policy 71. The Councils therefore require further discussions and the submission of additional information before being satisfied that the proposals can be appropriately mitigated through the proposed use of conditions.

20.4. Further discussions are required to update and agree the Design Principles to ensure high quality design is brought forward at the discharge of condition stage in order to improve the scheme's contribution to the policy objectives within SCLP 2018 policies HQ/1, NH/2, NH/6, NH/8, TI/2, TI/3 and CLP 2018 policies 5, 8, 17, 55, 58, 59, 70, 80 in relation to connectivity, accessibility cycle parking, landscape, trees and sustainability. The Councils also seek further discussions to agree appropriately worded conditions reflecting the comments made in this Statement of Case. The Councils expect these issues to be overcome through ongoing discussions with the applicant which would be captured in a Statement of Common Ground to be submitted to the public inquiry in due course.

20.5. The Councils agree that the proposal would be 'local transport infrastructure which can demonstrate a requirement for a Green Belt location' and agree with the applicant's assessment which identifies some Moderate to Moderate-minor to Minor impacts on the openness and purposes of the Green Belt. Therefore, the Councils consider that the proposal would be inappropriate development as defined in the NPPF 2024, notwithstanding that the degree of harm would be minimised by the proposed mitigation. There is however a clear and compelling need for the development in accordance with adopted and emerging development plan policies. The Councils consider that the scheme is capable of constituting "very special circumstances" which can outweigh the identified harm to the Green Belt, the impact on heritage assets and the loss of agricultural land. Whether the planning balance justifying 'very special circumstances' in favour of the proposals

is achieved or not is dependent upon the satisfactory resolution of the outstanding matters identified in this statement above which are subject to continuing discussion and engagement.

21. Appendix 1 – Evidence Library

1) South Cambridgeshire Local Plan 2018

Adopted/Published: 2018

Link: <https://www.scambs.gov.uk/media/17793/south-cambridgeshire-adopted-local-plan-2018.pdf> <https://www.scambs.gov.uk/media/17793/south-cambridgeshire-adopted-local-plan-2018.pdf>

2) Cambridge City Local Plan 2018

Adopted/Published: 2018

Author: Cambridge City Council

Link: <https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>

3) Cambridge City and South Cambs Transport Strategy

Adopted/Published: 4 March 2014

Author: Cambridgeshire County Council

Link: <https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridge-city-and-south-cambs-transport-strategy>

4) Local Transport and Connectivity Plan 2023

Approved: 29 November 2023

Author: Cambridgeshire & Peterborough Combined Authority

Link: <https://cambridgeshirepeterborough-ca.gov.uk/what-we-deliver/transport/local-transport-plan/>

5) Greater Cambridge Local Plan – First Proposals

Published: 1 November 2021

Author: Greater Cambridge Shared Planning

Link: <https://consultations.greatercambridgeplanning.org/greater-cambridge-local-plan-first-proposals>

6) Greater Cambridge Local Plan Transport Evidence Report Preferred Option Update

Published: October 2021

Author: Cambridgeshire County Council

Link: <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/Transport%20Evidence%20Report%20October%202021.pdf>

7) Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs report

Published: September 2024

Author: Icen Projects Limited on behalf of Greater Cambridge Shared Planning

Link: <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2024-09/EBGCLPGSSSep24v1Sep24.pdf>

8) Housing Minister letter on Greater Cambridge

Letter date: 23 August 2024

Link:

<https://assets.publishing.service.gov.uk/media/66cdf3f68e33f28aae7e1f67/housing-minister-letter-to-greater-cambridge-leaders.pdf>

9) The Case for Cambridge

Published: March 2024

Author: HM Government

Link: https://assets.publishing.service.gov.uk/media/65f1d8edff11704896615973/The_Case_for_Cambridge_March_2024.pdf

10) Greater Cambridge Green Belt Assessment – Final Report

Published: August 2021

Author: Land Use Consultants

Link: [Greater Cambridge Green Belt Assessment](#)

11) The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

Link: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573>

12) Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure

Published: December 2021

Author: Department of Transport

Link: [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure](#)

13) Guidance Note 8 Bats and Artificial Lighting at Night

Published: 2023

Author: Bat Conservation Trust

Link: <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

14) Cambridge Biomedical Campus Healthcare Impact Study final report

Published: 2023

Author: Cambridge Biomedical Campus

Link: [CBC health impact final Oct 2023](#)

15) Housing and economic needs assessment guidance

Published: 20/03/2015

Last updated: 24/02/2025

Author: Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities

Link: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

16) The Global Tech Ecosystem Index 2025

Published: 2025

Author: Dealroom.co

Link: <https://dealroom.co/tech-ecosystem-index-2025>

17) Cambridge Cluster insights)

Published: 2025

Author: Cambridge Ahead

Link: ([Cambridge Cluster Insights & Analysis](#) / [Welcome To Cambridge Biomedical Campus](#))

18) The Network Rail (Cambridge South Infrastructure Enhancements) Order - Transport Assessment, Environmental Statement Volume 3: Environmental Statement Appendix 17.2

Published: 20/12/2018

Author: Arcadis Consulting (UK) Limited for Network Rail Limited.

Link: <https://sacuksprodnrdigital0001.blob.core.windows.net/twao-cambridge-south-infrastructure-enhancements/Cambridge%20South%20infrastructure%20enhancements%20twao/NR16%20Environmental%20Statement%20documents/Volume%203%20Appendices%20and%20Figures/Appendix%2017.2%20Transport%20Assessment.pdf>

19) Chartered Institute of Ecology and Environmental Management (CIEEM) advice note on the Lifespan of ecological reports & surveys April 2019

Published: April 2019

Author: Chartered Institute of Ecology and Environmental Management (CIEEM)

Link: [Advice-Note Lifespan of Ecological Reports.pdf](#)

20) Cambridge Biomedical Campus Support Letter

Letter date: 13/08/2025

Author: Ed Watson, Interim Managing Director, On behalf of the directors of Cambridge Biomedical Campus Ltd

Link: [CBC CSET support letter to SK GCSP 130825.final \(2\) \(002\).pdf](#)