I write to strongly oppose Policy S/CBC/A’s recommendation to develop the two green belt fields between Babraham Road and Granham’s Road to further extend the Biomedical Campus for the following reasons.

**Destruction of Landscape Character and Setting**

The Proposal references creating ‘a new soft edge to the city’ – the very same thing that was said about the Ninewells estate during its planning process!

Despite what the policy proposes, no landscaping plan can create a ‘soft green edge’ to minimise the urbanising effects of a development comprised of a hard, commercial edge of large buildings and 900 homes. What is already a well used publicly accessible green space will be despoiled and so will some of the best views in Cambridge over the Gog Magog Hills.

Indeed, what appears to be the planners’ internal Site Assessment Survey for the Land at Granham’s Road (Site Ref. 40138) deems the suitability of the site as RED and states: ‘Development of the two larger fields would push the urban edge of the city to Granham’s Road *thereby significantly altering and weakening the strong divide between the urban and rural landscape and creating significant harm to the landscape character and setting of the City*’. (Emphasis added.)

<https://mail.google.com/mail/u/0/?tab=rm&ogbl&zx=38m04lcot5c1#inbox/WhctKKXHGbDLqZTXBZXJTPGVgbHWSMZhTCbWLrVQsSNsNqKnRmsHsjMvTXlMDlsWnxbQqnv?projector=1&messagePartId=0.1>

**Ecological Destruction**

The measures set forth in Policy S/CBC/A to mitigate the negative impact on biodiversity are insufficient to do so, nor will they achieve biodiversity net gain. Indeed, the proposed development would reduce the habitat available to farmland wildlife and in particular threatened farmland birds. It is entirely unrealistic to expect that Policy S/CBC/A, as proposed, will achieve a minimum 20% biodiversity net gain, leave the natural environment better than it was before or help halt the decline in species abundance. See ten-year survey report by ecologist John Meed at <https://queen-ediths.info/wp-content/uploads/2021/12/Response-to-Policy-S_CBC-JM.pdf>

Taking the extreme step of approving further development of the Biomedical Campus by encroaching on the green belt is not the answer. The Biomedical Campus should first be required to optimally utilise its existing, piecemeal campus, properly developing it to improve the wellbeing of campus users and using this opportunity to better manage the very real, negative spillover impacts on the wider neighbourhood.

**Flooding**

The area between the Ninewells estate and Granham’s Road is prone to significant flooding. It lies at the bottom of a hill and collects all the water running down from slopes of clay - it has been flooded for the best part of the three winter months in 2020 (photos available). Indeed, the Policy Proposal acknowledges that the high water table and surface water flooding present challnges to development in this area. Despite a SUDS system on the Ninewells estate, flood mitigation problems have plagued the LEAP area with drains and drainage ditches failing.

The following maps establish that the fields under consideration for development are liable to surface flooding after heavy rain:

<https://www.cambridge.gov.uk/media/2568/strategic-flood-risk-assessment-appendix-b-part-4.pdf>  
  
<https://www.cambridge.gov.uk/media/2577/strategic-flood-risk-assessment-appendix-d-part-1.pdf>  
  
<https://www.cambridge.gov.uk/media/2572/strategic-flood-risk-assessment-appendix-b-part-3.pdf>

Moreover, the Environment Agency's map of long-term flood risk shows a medium flood risk over a major part of the fields: <https://check-long-term-flood-risk.service.gov.uk/map?easting=547091&northing=254875&map=RiversOrSea>

**Other Factors**

The Policy states ‘Development is dependent on the successful implementation of a Trip Budget approach, to ensure that the level of vehicle trips is limited to an appropriate level for the surrounding road network.’ If that is the case, then unless the level is ‘zero’, no development should be sanctioned because the road network is already overloaded.

Moreover, as the proposed use of this land is for employment space, won’t this *intensify* the imbalance between jobs (too many) and housing (too little)? Yet rebalancing these factors is supposed to be one of the big aims of this Plan.

Approval of further development at this stage seems untenable given the lack of any spare capacity in Cambridge’s water supply, as set forth in the Greater Cambridge Local Plan’s Strategic Spatial Options Assessment.

**Conclusion**

In sum, there are no exceptional circumstances justifying the removal of the fields between Babraham Road and Granham’s Road from the green belt. To do so would forever alter the character of the landscape and ecology in this part of Cambridge, increasing the congestion in what is already an overly crowded area that does not have the necessary infrastructure to handle it (and likely will not, even after the South Station is built). The Biomedical Campus has ample room within its existing borders – and as expanded in its approved next phase – to realise the improvements it wishes to make without further encroaching on the surrounding countryside, which is enjoyed by the neighbouring community.