

EW/EAEM/DP5219/January 2026

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Dear Greater Cambridge Local Plan Team,

## **Representations to Greater Cambridge Local Plan on behalf of Trinity College, Cambridge Cambridge Science Park North (CSPN)**

### **Introduction**

This letter has been prepared by DP9 on behalf of Trinity College (CSP) Limited (hereafter referred to as 'Trinity'.) in relation to representations to the Greater Cambridge Local Plan (Regulation 18) Draft Local Plan Document (GCLP).

The exclusion of a draft allocation for CSPN at this stage is regrettable and it is Trinity's view that following a review of both the GCLP and supporting evidence base, together with the Cambridgeshire and Peterborough Local Growth Plan, that neither document's current aims are deliverable without CSPN being allocated.

As highlighted within the Greater Cambridge Employment and Housing Evidence Update (September 2025), a total projection of 1,341,000sqm of employment floorspace is required to be delivered between 2024 and 2045. The report continues to state that the figures indicate substantial potential demand for floorspace of a variety of types.

It is recognised that there has been an update to Housing and Employment Land Availability Assessment (HELAA) and that the site has had an updated assessment. It is disappointing to understand that regardless of the submission of significant further documentation in response to the previous HELAA assessment, that a number of the assessments have remained unchanged. This will be discussed further in the following sections of this letter.

This letter sets out the exceptional circumstances for development at Cambridge Science Park North. It is submitted alongside a series of complementary reports and technical notes as follows:

The evidence base documents that these representations refer to are:



- Draft Greater Cambridge Housing and Employment Land Availability Assessment – Addendum Report (HELAA) (2025)
- Draft Greater Cambridge Local Plan Sustainability Appraisal
- Draft Greater Cambridge Local Plan: Jobs Topic Paper (2025)
- Draft Greater Cambridge Employment and Housing Needs Evidence Update (2025)
- Draft Greater Cambridge Transport Evidence Report (2025)

This document sets out the context and relationship with Cambridge Science Park; the identified need to provide for mid-tech employment space; a review of the updated HELAA and outcome for CSPN; an overview of the proposed North East Cambridge Policy, and why without CSPN this is undeliverable and finally a summary of the exceptional circumstances.

### **Cambridge Science Park – Existing Development**

Integral to Cambridge’s success as a globally renowned centre of scientific excellence is Cambridge Science Park.

Cambridge Science Park was founded in 1970 as the first science park in Europe by Trinity College Cambridge. The site established a benchmark for the future at that time, based on the then-government’s ambitions to forge a future on the ‘*white heat of the scientific revolution*’.

Fifty years on, we are in a new era of national focus on research, science, and innovation as the driver for economic success in the UK. Allied to this, is the growing understanding that mature science parks benefit enormously from adjacent development hubs to ensure research products can be tested for manufacture ready to market. Indeed, the emerging JLP makes space for this aligned to bio-sciences but largely ignores the needs of the wider R&D sector which build the diversity and success of the Cambridge economy.

Cambridge Science Park today comprises 150 acres, and approximately 260,000sqm of predominantly research and development floorspace, supporting the employment of approximately 8,000 people working in over 130 companies focussed on science and innovation and including but not limited to AI and digital, life sciences, creative and clean energy industries.

### **Cambridge Science Park North – Proposed Development**

As submitted to the draft Local Plan process through the Call for Sites exercise, both growth at Cambridge Science Park and the creation of Cambridge Science Park North were put forward for consideration. Cambridge Science Park North (CSPN) aims to respond specifically to the need for mid-tech floorspace within Cambridge.

The proposal comprises approximately 165ha of mixed-use development, comprising (but not limited to) mid-tech commercial floorspace, transport hub, education hub, sports provision and a biodiverse County Park.

The site is set to be well-connected to both existing and planned infrastructure offerings including the route of the Cambridge-Waterbeach Guided busway traversing the site, with the ability to add a new guided busway bus stop to serve both CSPN and the community of Histon and Impington; improved



pedestrian and cycle routes across the site linking Milton with Histon and Impington together with improved routes to Cambridge North Railway Station.

CSPN will provide a significant increase in community offering in the area, including the creation of a 80ha Country Park. Within and adjacent to the park will be a number of additional community facilities including sports fields, a community farm, nursery and a converted farmhouse as a community facility.

In addition to the physical offerings on site, CSPN will boost and strengthen the Northeast employment cluster with new and more diverse job opportunities, which are within suitable commuting distance of a number of significant residential developments including Waterbeach and Northstowe New Towns, linking good employment opportunities with accessible residential locations.

### **Mid-Tech Space – A Clear Identifiable Need**

Within previous representations made to the Greater Cambridge previous Regulation 18 Consultation in 2021, it was stated that Cambridge was forecast to grow by an additional 58,500 jobs between 2020 and 2041, but that the requirements were not recognised or addressed in the draft local plan. Additionally, the existing and potential value of the mid-tech sector to Cambridge was also not addressed within the document.

It is understood that following the change and updates to the plan period, 73,300 additional jobs are required for the period of 2024-2045 across a diverse range.

Representations made in 2021 by Trinity College Cambridge identified to the lack of allocations for mid-tech, specifically the failure to include them within the ‘key sectors’ that are used to forecast employment need and to identify them as a growth sector.

The amended draft allocations within the 2025 consultation draft version of the emerging local plan has included some minimal mid-tech allocations, particularly at Eddington and North East Cambridge, although these have been allocated in a group alongside other technological industries as a lump figure. Additionally, the mid-tech proposed allocation at Eddington is solely for university-based development not the whole mid-tech sector.

The Greater Cambridge draft local plan identifies a need of 317,000sqm of industrial floorspace. This is against a supply of 29,000sqm allocated within the draft plan, resulting in a significant shortfall of approximately 288,000sqm over the plan period of 2024-2045. This is without factoring in suppressed demand, which increases the need for industrial space to between 686,804sqm and 994,267sqm over the plan period.

Furthermore, the Greater Cambridge Growth Sectors Study identifies specific locational requirements for mid-tech and industrial sectors, which includes accessibility to the site including through public transport, proximity to existing clusters and growth areas and place-based business destinations with amenities. All of which are arguably best described to be attributes of CSPN.

It is vital that additional sites are allocated within the next version of the draft Local Plan in order to address the shortfall within the current version. Cambridge Science Park North aligns with these requirements as it proposes to provide mid-tech floorspace in a highly sustainable and well-connected part of Cambridge.



## HELAA

One element of the assessment of site suitability is the Housing and Economic Land Availability Assessment (HELAA) which considers whether individual sites are suitable on the basis of planning, transport and environmental factors.

The originally published HELAA assessed sites submitted as part of the Call for Sites process, in terms of their suitability, availability and achievability. Greater Cambridge have since published an updated HELAA which takes into consideration representations and additional technical documentation submitted as part of the 2021 First Proposals consultation process. For Cambridge Science Park North, a series of complimentary reports and technical notes were submitted alongside the representations as follows:

- Local Plan First Approach Economic Response – Volterra (December 2021)
- Landscape and Green Belt Study – The Landscape Partnership (Updated December 2021)
- Cambridge Science Park North Prospectus – Perkins & Will (December 2021) Mobility Note – Vectos (December 2021)
- CSPN Local Plan Representations: Policy S/NEC: Northeast Cambridge – Vectos (December 2021)

Therefore, alongside the main body of text within the representations, this is the information that the HELAA was updated in response to, covering economic need, landscape, mobility and the Green Belt.

Within the updated HELAA (2025) it is disappointing to see that the CSPN site still has an overall suitability score of red, deeming it ‘unsuitable’ overall.

The individual pertinent aspects that produce the score within the HELAA are discussed below.

### Landscape

The only element in which the site scores red for is Landscape, a continuation from 2021 and the 2023 update on the HELAA. It is stated that *“the new information provided does not affect or alter the issues which remain with Landscape. Significant loss of the landscape buffer between Histon, Milton and Cambridge and the loss of distinctive landscape features which contribute to the landscape character”*.

Submitted as part of these representations is a Landscape and Green Belt baseline review produced by The Landscape Partnership. The report details the site and surrounding landscape characteristics, designations and views.

The report states that *“the Site is well contained by existing vegetation and landform. There are no key views of Cambridge’s historic core, skyline or landmark buildings from within the Site, nor does the Site form part of any identified key views towards the city. Views into the Site are generally localised and filtered, experienced primarily from the Cambridgeshire Guided Busway, Mere Way public byway, limited sections of Milton Road, and a small number of properties on the edges of Histon and Impington. Longer-distance views are constrained by woodland belts, polytunnels and restored landfill land to the east and north-east”*. This shows that visually, there would be no substantial loss of the gap between Milton and Histon and Impington as the site would not be visually identifiable from the



villages due to the already existing natural barriers. It provides capacity for the site to accommodate change without giving rise to widespread or significant visual effects.

The Green Belt study undertaken by the Landscape Partnership concludes that the site does not contribute strongly to the purposes which are most relevant in the Cambridge context. Applying PPG criteria, the Study concludes that the Site does not strongly contribute to Green Belt purposes a), b) or d), and therefore could be considered to meet the definition of Grey Belt. This does not imply that development should automatically be approved, but it is a material consideration in plan-making and decision-taking.

In relation to settlement separation, the Site does not form part of a gap between towns, and development would not lead to the merging of Cambridge with other towns. While the Site contributes to the rural setting of Histon, Impington and Milton, the substantial distance between these settlements, combined with existing woodland belts and the proposed retention of extensive green infrastructure, would ensure that their individual identities are preserved. The conclusion reached by the Landscape Partnership is key and directly counters the current summary of the HELAA report, which is the majority of the reason for the 'red' rating of the site as a whole.

It is therefore considered that the Council should reconsider their assessment of the site in light of the detailed assessment provided to them as part of these representations.

#### Highways

Despite submitting further information in relation to the strategic highway network and its capacity (Mobility Note, Vectos), following comments highlighted by the HELAA in 2023, there has been no update with regard to this element. It is deemed however that despite the Transport and Roads RAG Assessment 2023 being Amber, the comments do not provide any objection to the proposed site allocation, but rather just highlight the likely requirement for significant infrastructure improvements to be required, in addition to a robust Travel Plan.

As a result, it is considered that the site should be perceived favourably with respect to Transport given the highly accessible nature via sustainable transport modes.

#### Availability and Achievability

The site is rated Green for both Availability and Achievability which are significant factors within the site promotion process. Trinity College Cambridge confirm the site is indeed both available and achievable, in addition to strongly considering the site to be deliverable within the plan period.

#### **Exceptional Circumstances**

The principle of the establishment, protection and alteration of Green Belt boundaries is set out within the National Planning Policy Framework (NPPF) which states *“once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”*



The exceptional circumstances policy test that needs to be met for land to be released from the Green Belt should be assessed through the Local Plan process. The NPPF provides that the test is considered to be met if there is a need for development that cannot be met elsewhere. Local Planning Authorities must be able to demonstrate that they have fully examined all other reasonable options, including making use of suitable brownfield sites for meeting the identified need for development before seeking to release Green Belt land.

The NPPF goes on to state that where it has been shown that it is necessary to release Green Belt land for development, plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

In December 2025, the Government published the Consultation Draft Version of the National Planning Policy Framework, which sets out the Government's aim and initiatives for plan making and decision making in England. The consultation draft includes a number of key new and updated policies which some could consider to be the biggest shift in policy making since the introduction of the NPPF in 2012. Whilst it is understood that the LPA are working towards submission of this Local Plan by December 2026 emerging National Policy should not be ignored entirely.

Draft Policy S5 (principle of development outside settlements) sets out the requirement for only certain forms of development to be approved outside of settlement boundaries. This includes development for housing and mixed-use which would be *"within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services<sup>26</sup>"*. Footnote 26 expands the use of the term 'railway stations' to include underground, tram and light-rail. The Cambridge Guided Busway is authorised through the legal mechanism of a Transport and Works Act Order (TWAO) and so it is considered that the guided busway would fall under the footnote definition. Given the sites proximity to the proposed Waterbeach guided busway (with the inclusion of a stop within the site), then the criteria required by Policy S5 would be met.

Furthermore, Policy GB3 of the draft NPPF states *"Green Belt boundaries should be altered through the preparation and updating of local plans and where: this would enable the development of land around stations"*. Given the above identification of the Waterbeach guided busway as a 'station' within Footnote 26, it is considered that the requirements of GB3 for the alteration of Green Belt boundaries could be met for the Cambridge Science Park North site, in addition to the numerous other reasons set out within these representations.

### The Need for Mid-Tech Land

As set out above, there is a clear and identified need for mid-tech land within Greater Cambridge that is not currently provided for within the emerging Local Plan. Volterra have confirmed that there is currently an undersupply of 288,000sqm over the plan period of 2024-2045 for industrial uses, including Mid-Tech. This is due to the local plan including a need of 317,000sqm of industrial floorspace but only supplying 29,000sqm.

The Greater Cambridge Growth Sectors Study identifies specific locational requirements for mid-tech and industrial sectors, which includes accessibility to the site including through public transport, proximity to existing clusters and growth areas and place-based business destinations with amenities. Volterra have confirmed how Cambridge Science Park North meets these requirements set out by the



Growth Sectors Study including being within very close proximity a significant existing cluster as well as providing enough opportunity for it to form a growth cluster of its own, through the provision of significant amenities and services. This includes but is not limited to an 80ha Country Park, improved cycle and footways, a new guided-busway stop and a community farm and building.

#### Proximity to CSP and Long-Term Custodianship

Global trend analysis shows that in order for these developments to be operating at their economic peak, they need to be physically located in close proximity to where the research and development is taking place. Cambridge Science Park North provides an opportunity for this locational advantage to be maximised via active and sustainable modes of transport.

Evidence to date would suggest that establishing standalone sites further out of the City do not work, indeed if sites are not available the choice to locate to alternative premises offering research and development facilities linked to skilled manufacturing widens globally rather than just to alternative locations within the UK. If we do not provide these facilities in Cambridge, these companies may choose to locate operations outside of the UK altogether.

For similar reasons, dispersal of these types of employment land does not work and are likely to result in change of use applications in future.

Not only is there a high prevalence of these sectors already at Cambridge Science Park, it is also home to some of the more exportable subsectors within this employment sector. Cambridge Science Park has considerably higher exportability than the national average in both high-tech and mid-tech sectors. South Cambridgeshire is similarly above the national average, although less evidently than Cambridge Science Park itself.

This is an indicator that even within the productive sectors of high-tech and mid-tech, Cambridge Science Park exhibits a greater concentration of highly exportable industries than the average for these already very productive sectors. This further indicates

- (a) that the sectors which choose to locate at Cambridge Science Park are highly valuable with high rates of exports, and
- (b) there is an environment at Cambridge Science Park which engenders productivity.

Furthermore, the existing Cambridge Science Park is of national significance. Being the first of its kind, it has fostered collaborative working across the UK tech and life sciences sectors both within Cambridge and nationwide. Additionally, it attracts top-tier global tech companies due to its enduring competitive global brand. It forms part of the Oxford-Cambridge Arc and the innovative growth corridor between London too, showing its location as an area of high quality provision for the science and technology sector. There is every intention that the provision at Cambridge Science Park North will match and elevate this global position.

#### Key Public Benefits of Cambridge Science Park North

##### *Socio-Economics*

From a socio-economic perspective, a key factor affecting social inclusion is access to education and training opportunities for existing residents, which in turn facilitate the ability of those residents to



access and reap the benefits of the jobs delivered by economic growth. Ensuring that residents have the opportunities to develop their education and training levels, such as those that would be afforded by Cambridge Science Park North through job opportunities, apprenticeships and the development of the Cambridge Regional College (CRC), would be key to promoting wellbeing and social inclusion for Greater Cambridgeshire residents.

Cambridge Science Park has established and will continue to undertake positive engagement with local communities, there is a strong desire to inspire the next generation of innovators.

Cambridge Science Park North offers the potential to co-locate workspace required by CRC with mid-tech employment provision. This has the potential to offer multiple benefits including:

- Provision of learning space to fulfil the requirements of a growing population. CRC is already at capacity, there are already demographic and future planned growth in the surrounding area will only add to demand, therefore the campus will need to physically expand and the logical location for this growth will be at CSPN.
- Locating apprenticeship opportunities within cycling and walking distance to one of Greater Cambridgeshire's most deprived areas.
- Breaking down barriers to employment for students following vocational training routes and providing inspiring learning opportunities within a thriving Science Park environment.

Crucially though, without skilled manufacturing opportunities in Cambridge, there will be a shortage of job opportunities for people who want to work in a technical or engineering environment but do not have the qualifications to undertake the roles that require a university degree. These include students at the Cambridge Regional College and North Cambridge Academy.

If Cambridge allocate sufficient space to accommodate the manufacturing space required by these companies in a sustainable location, a real opportunity exists to develop and nurture this category of jobs through the long term custodianship provided by Trinity College can be assured. This would help to close the inequality gap in the city, and help lift families out of poverty, particularly those in the immediate vicinity of the proposed development such as Arbury and Kings Hedges.

### *Public Transport*

The site is extremely well linked to existing public transport corridors, located on an existing guided busway and being a site earmarked for a new guided busway and within close proximity to Cambridge North Railway Station. The locally consented Cambridge-Waterbeach Guided Busway can include a Cambridge Science Park North stop, which Trinity College Cambridge supports and wholly endorses as a forward-thinking approach to infrastructure provision.

Strategic public transport infrastructure including the GCP Waterbeach to Cambridge transit route, and the potential for a segregated bus route connecting the Milton Road Park & Ride and public transport links into Cambridge can all be achieved and accommodated within CSPN.



## **Conclusion**

The exclusion of a draft allocation for CSPN at this stage is regrettable and it is Trinity's view that following a review of the evidence base for the emerging Local Plan, the current aims within it are not deliverable without the allocation of CSPN.

As set out above, there is a clear need for Mid Tech within Greater Cambridge, and the NPPF allows for the release of Green Belt land under exceptional circumstances when it is required. The above sets out the reasons for its release, including the provision of significant public benefits the CSPN proposals would provide. The Green Belt review concludes that the proposed development would not have a substantial impact on the closing of the gap between settlements and the parcel of green belt does not provide significant contributions to the elements of the green belt relevant to the Cambridge setting.

Exceptional circumstances are set out in the above text, focusing on the provision of the current unmet need for mid-tech space, significant public benefits and the link with the existing Cambridge Science Park.

It is therefore considered that the Cambridge Science Park North site should be allocated within the next draft version of the emerging Local Plan.

Yours faithfully



**DP9 Ltd.**