Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Alison Stanley	
Organisation (where relevant)	Gonville & Caius College, University of Cambridge	
Job Title (where relevant)	Endowment Property Manager	
Address, including Post Code	Trinity St, Cambridge CB2 1TA	
Telephone	[redacted]	
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy J/AW: Affordable workspace and creative industries
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	Yes / No
Legally compliant	Yes
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Gonville & Caius College, University of Cambridge ("Caius") recognises some businesses within Greater Cambridge experience affordability pressures and supports the overarching objective of promoting the provision of affordable workspace within employment developments.

However, Caius has concerns as to the soundness of Policy J/AW particularly whether it has been properly evidenced and would be effective in meeting its objectives. The evidence identifies affordability pressures particularly affecting SMEs, start-ups and creative businesses, but the policy applies a uniform requirement to a broad range of industrial and storage development with very different characteristics, values and operational requirements.

The policy, requiring discount to market rents of 20-30% in perpetuity and requiring affordable space to be predominately on site, could also have significant financial and operational implications.

The evidence does not sufficiently establish why 10% is an appropriate proportion of affordable workspace across all qualifying employment development.

The Affordable Workspace Study (2026) (9.1.2) says…*"The evidence suggests that affordable workspace requirements should be tailored to the differing market conditions across Greater Cambridge rather than applying a single approach everywhere"*…and … "…*with around 10% frequently used as a benchmark. However, the level of provision is typically subject to viability, with flexibility applied depending on site characteristics and development context*."(10.2.1).

This would appear to differ materially from the Reg19 policy, which establishes a minimum 10% requirement for all qualifying E(g)(i-iii), B2 and B8 development, regardless of location, scheme type, land value or market conditions, and scale over 1000 sqm (offices and R&D) (requiring 30% market rent discount in Cambridge and 20% in South Cambridge) and 2500 sqm (industrial/logistics) (requiring 20% discount to market rents) thresholds.

We consider how the 10% requirement has been derived and why a uniform proportion is appropriate across the full range of affected development, from relatively small multi-unit industrial schemes to large single-occupier logistics schemes should be clearly

evidenced. It should also explain why the proportion should not instead be determined through a scheme-specific assessment of need and viability.

In this regard we note that London Plan Policy E3 (the area containing most established affordable workspace policies) is circumstances-based rather than a general development requirement where planning obligations may be used to secure workspace at rents maintained below market rate for a specific social, cultural or economic development purpose.

Moreover, a material consideration is not whether the 10% requirement can be accommodated in isolation, but whether development remains viable when the cumulative effect of Policy J/AW is considered alongside the Plan's other policy requirements, Section 106 obligations, and the planned introduction of CIL.
This cumulative impact is particularly important for employment development, where development and land values can vary significantly between locations and development typologies.

The payment-in-lieu provisions raise a separate concern. Where strategic industrial or logistics sites are unsuitable for affordable workspace, but the in lieu provision is primarily intended for SME, start-ups and creative occupiers in more suitable locations, the Policy should set out why large employment space should fund small employment space elsewhere.

There also appears inconsistency for the "in lieu" calculations. The Policy refers to GIA as the relevant starting point ,but Appendix G refers to NIA as the starting point.

Caius therefore finds Policy J/AW unsound on the following grounds:

Positively prepared - the 10% space requirement and discount to market rents of a minimum 30% within Cambridge and 20% discount to market rent in perpetuity in south Cambridge could lead to viability issues impacting on the plans objectively assessed needs.

Justified - a more site by site or employment typology approach would be a more appropriate strategy rather than the blanket approach proposed; and

Consistent with national planning policy - whilst the NPPF supports employment and business it provides no framework or policy requirement for affordable workspace, hence the Reg 19 policy requires to be fully evidenced.

Please provide a 100 word summary of your representation.

Gonville & Caius College objects to the soundness of Policy J/AW, arguing its blanket 10% affordable workspace requirement lacks rigorous, typology-specific evidence. Applying a uniform requirement—plus between 20 –30% rental discounts in perpetuity —fails to account for distinct value and operational differences across industrial, storage, and logistics sectors. The cumulative impact of this policy alongside other Section 106 obligations and CIL could poses significant viability risks to broader employment delivery. Additionally, the payment-in-lieu metrics lacks consistency. The policy should be replaced with a flexible, scheme-specific assessment based on localized need and proven economic viability.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

NONE

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

If the Councils are minded to retain Policy J/AW in relation to E(g)(iii), B2 and B8 development, Caius considers that it should be substantially amended to provide a more targeted, flexible and proportionate approach.

In particular, the blanket 10% requirement should be replaced with a scheme-specific approach based on demonstrated local need, operational suitability and viability, including the cumulative cost of other Local Plan and infrastructure requirements.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	YES

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Caius is a significant landowner thought Greater Cambridge. Its core educational estate is complimented by extensive agricultural, residential, and commercial land and property much of which has development potential. Caius wishes to directly express its views to the Inspector.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	YES
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	YES
Informed of adoption of the Local Plan	YES