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	Matt Nicholson	Julia Foster
Organisation (where relevant)	Wellcome Genome Campus Limited	David Lock Associates Limited
Job Title (where relevant)	N/A	Managing Partner
Address, including Post Code	Wellcoem Genome Campus Biodata Innovation Centre Wellcome Genome Campus Hinxton Cambridge CB10 1RQ	50 North Thirteenth Street Central Milton Keynes Milton Keynes Buckinghamshire United Kingdom MK9 3BP
Telephone	N/A	01908666276
Email address	N/A	JFoster@DavidLock.com

* 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 I/ID: Infrastructure and Delivery
Proposed Submission Policies Map	N/A
Sustainability Appraisal	N/A
Habitats Regulations Assessment	N/A

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.

These representations are made on behalf of Wellcome Genome Campus Limited (WGCL). WGCL is the Wellcome owner-developer-operator charged with leading the Wellcome Genome Campus and delivering its ongoing transformation and expansion as a globally significant **science ecosystem and community.** This ambition is intrinsic to both the substantial scale of development now underway on the 'expansion land', to the east of the A1301, and in priority WGCL is now directing towards modernising the existing Campus, west of the A1301. WGCL's vision is to bring these areas together as an open, diverse and connected place that puts people first, supports collaboration and innovation using digital technology and delivers a shift to active travel. WGCL is evolving the Campus from a closed, gated workplace into a place and destination. Increasingly, the Campus will have the characteristics of a small town, one with a clear purpose derived from its science mission. The Local Plan represents an opportunity to guide this change and secure wide benefits.

WGCL want to assert the important role of the expanding Campus and the part it can play in the growth and success of Cambridge, as a location for life sciences of national and global significance. Realising this potential is dependent upon achieving an effective and sustainable movement network across the communities and investment locations within the Southern Cluster, and integrated back into the City.

WGCL is working hard to:

- externalise and promote the activity which underpins the work undertaken at the Campus and ensure this vital activity can be sustained;
- accelerate the benefits arising amongst common interests within the Southern Cluster; and
- open up the Campus to the wider community.

With Policy support, the enormous investment that has underpinned the operation of the Campus to date, and that which is planned, could yield far greater economic and social benefit while furthering the science mission.

WGCL is greatly encouraged by the recent response of officers and members to its ambitious proposals, and efforts to evolve the Local Plan Policy to facilitate next steps and embody flexibility to allow the Campus to change and adapt over the period ahead. Good progress has been made between the Regulation 18 and Regulation 19 versions of the Plan in this regard. There was insufficient progress at Regulation 18 to fully engage with and consider the implications of the wider Plan Policies, in terms of cumulative demands, infrastructure needs, viability and delivery. These are now central to the question of soundness and this further representation on behalf of WGCL.

There are three principal elements to this Regulation 19 submission:

1. The Wellcome Genome Campus Policies are now, for the most part, well formed to provide the basis for decision making in relation to both continued implementation of the extant planning permissions for expansion and to evolve the existing Campus over time. There are a number of relatively minor modifications that would ensure the Policy is as clear and effective as it needs to be. WGCL is hopeful that these can be resolved through further engagement with officers in advance of Examination.

2. Creating the conditions necessary to realise the investment potential enshrined in the Wellcome Genome Campus Policies requires that the Local Plan is aspirational but is also deliverable. For WGCL, focused upon delivery at Wellcome Genome Campus, the Local Plan is more than a development management tool. The Plan needs to be a positive signal to investors, underpinning, not detracting from the competitive advantage of the location. As it stands, the forward plan for infrastructure delivery that underpins the Plan is uncertain and incomplete. Certainty around strategic transport infrastructure is WGCL's greatest concern. Without commitment on this front, the Local Plan signals a high level of risk to investors.

3. The challenges around infrastructure investment layer into a multitude of onerous and costly policy obligations across the Plan, the cumulative impact of which in any specific location (especially where the transport infrastructure deficit is considerable) is not tested, or is masked by a broad, whole plan viability assessment. WGCL is not convinced that the deliverability of the Plan is sufficiently secure.

In these representations, '**The Wellcome Genome Campus'** or '**Campus**' refers to the full extent of the WGCL interest, including both the existing Campus, associated parkland and wetlands, and the expansion land to the east of the A1301.

The Greater Cambridge Local Plan succeeds in articulating a positive vision and ambition for a substantial scale of growth. It also identifies the significant infrastructure challenges that already exist across the City and South Cambridgeshire, and the degree which those challenges multiply with any additional plans for development, over and above that already committed, but not yet implemented.

The principal issue is not whether growth should occur, but whether the infrastructure, funding mechanisms and delivery arrangements necessary to support that growth have been demonstrated with sufficient certainty to satisfy the tests of soundness.

The Plan also demands that every development proposal meets high expectation and stretched targets for sustainability, design, greening, BNG, community infrastructure and a wide range of community and housing needs, including affordable housing and affordable employment space. It is not apparent in the evidence base that the full cumulative burden of these policy demands, and infrastructure requirements has been fully assessed, either broadly or in relation to policy areas and allocations. Where there is sensitivity testing through site appraisals within the viability evidence, there is no evidence of regard for the site-specific constraints or testing of the assumed capacity of the sites. The Urban Greening requirement appears not to have been factored into the viability testing at all, in terms of potential impact upon developable area across larger, mixed-use sites, in combination with other land use budget considerations.

Cumulatively, the cost burden of these Policy demands upon development is unprecedented in this locality and adds to spiralling build costs. There has been significant build cost inflation over the last couple of years, and more is expected over the period ahead. Meanwhile, rents and values have remained largely static or are now subject to downward pressure.

A ‘whole plan’ approach to viability (and a simple per unit apportionment of anticipated Section 106 costs) is potentially a valid approach across a plan area reliant on many smaller and medium sized allocations and where any individual proposal is unlikely to be critical to the Development Strategy, or greatly dependent upon shared, strategic infrastructure. That is not the case in Greater Cambridge. Large sites and new communities are critical to the Development Strategy and to unlocking (majority funding) the infrastructure upon which there is wide dependency, especially where interconnected priority and opportunity exist, as across the Southern Cluster.

The absence of clarity on transport infrastructure is the principal concern. Furthermore, the reliance upon large sites, many of which are already subject to Outline Planning Permission, involving phased development and a monitor and manage approach to delivery, requires a level of further site-specific scrutiny. They remain a priority for infrastructure investment. A simple assumption that permission assures delivery and the infrastructure commitment is fully understood and funded, is not the case.

CIL presents opportunity to better address strategic transport needs, but the approach to assigning CIL, forward funding in anticipation of CIL collection and how it combines with Section 106 Contributions and other funding streams, is not yet clear or even explored in the Infrastructure Delivery Plan.

Sustainable accessibility and connectivity across the Southern Cluster is the single biggest priority and concern for WGCL. Securing an effective, integrated transport network requires more than a shopping list of potential interventions in a broad Transport Strategy (which at present is not even in final form). It needs to be translated into a meaningful delivery programme, bedded into the Local Plan, with scope, costs, funding, timing and actions understood. The transport position presented in the IDP provides no evidence to demonstrate the transport interventions needed can and will be secured. Identified schemes are not scoped or costed or even directly related to the policy proposals. The NPPF (2024) paragraph 35 is clear 'Plans should set out the contributions expected from development' and policies that demand contributions 'should not undermine the deliverability of the plan. This is only possible if the full infrastructure costs are understood; the cumulative impact of policy demands is properly accounted for a site level.

WGCL are looking to the Local Plan and Transport Strategy to direct effective, collaborative and urgent action to set priorities and assemble credible, fundable transport solutions. WGCL is engaging directly with the Combined Authority on the emerging Greater Cambridge Transport Strategy in respect of the transport commitments necessary to realise investment plans at the Wellcome Genome Campus. Should this engagement not yield a positive outcome in the final version of the emerging Transport Strategy, WGCL will seek opportunity to expand upon these representations in relation to transport, in anticipation of the Examination.
The viability position presented does not acknowledge the limitations of the Infrastructure Delivery Plan or work that is incomplete. And yet it is concluded that the Plan, as a whole, is deliverable. This seems a very premature conclusion given the absence of essential information.

Only at page 761 of the Local Plan does the delivery challenge surface. It is implicit in all the preceding pages that the Local Plan allocations are deliverable, meeting all, full policy expectations and fully cognisant of infrastructure requirements and build costs. This is misleading; it is not founded upon the evidence as it stands or indeed real experience of delivering large, complex development schemes across Cambridgeshire.

Only under Policy I/ID is the scope for site specific viability acknowledged and this is without recognition that the infrastructure burden alone will virtually always necessitate negotiation of priorities on large schemes, very often because of the transport mitigation ask. The Policy places the burden of proof entirely upon the developer, when it is entirely appropriate that the developer should be satisfied that major Local Plan Allocations are intrinsically viable and deliverable. If this approach succeeds, the need to balance and prioritise will only be revealed when a planning application is made. This means the developer bears to the full brunt of objection, having 'failed' against policy expectation. Communities have unrealistic expectations and are likely to be disappointed. This does nothing to build confidence, trust and support for the Plan or subsequent allocations. It may well deter beneficial investment.

The longer term opportunity at the Wellcome Genome Campus is to be the subject of a new master planning exercise and WGCL hope that can provide the forum in which to resolve priorities and shape an unencumbered, deliverable set of proposals. Investment will be frustrated if every stage of the planning process is embroiled in protracted negotiation over viability.

A good deal more work needs to be done to properly understand the cumulative impact of infrastructure and policy requirements and then forward plan for delivery, most particularly in relation to infrastructure.

Please provide a 100 word summary of your representation.

WGCL questions whether the infrastructure, funding and delivery arrangements needed to support that growth have been demonstrated with sufficient certainty. Particular concern is raised regarding the lack of a clear, costed and deliverable transport strategy for the Southern Cluster, which is critical to the success of the Wellcome Genome Campus and wider Development Strategy. WGCL also considers that the cumulative impact of policy requirements, infrastructure obligations and viability pressures has not been adequately assessed, particularly on large strategic sites, creating uncertainty over deliverability, investment confidence and the overall soundness of the Plan.

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.

N/A

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.

This objection cuts across the Plan and goes to the heart of Policy I/ID. Depending upon the outcome of the further work on viability which WGCL suggests is necessary to be confident in delivery, multiple policies that impact upon viability or require specification of contributions may need to be amended to acknowledge that all policy ambitions cannot be met on all sites. WGCL has not objected to every Policy where this might apply. Instead, WGCL presents an overarching concern here in relation to the primary delivery policy. It may be that a more informed position in relation to delivery can be addressed under this Policy alone, as long as other policies make suitable cross reference.

WGCL requests that careful consideration is given to the cumulative impact of policies across the Plan on development costs and the infrastructure need in relation to specific allocations. WGCL fail to see how this Policy can be regarded as sound without either:

- Having a definitive and detailed plan for infrastructure delivery, including transport, based upon firm evidence; or
- being directly and explicitly honest about the competing priorities for funding and investment, and the need to balance those priorities, setting parameters for what can and should be delivered through CIL and Section 106.

As a general point, while WGCL recognises the time constraints upon production of this version of the Plan, the lack of cross reference from the Policies to the supporting specific evidence base (the totality of which is overwhelming in scale, has made it extremely difficult to identify and establish on what basis individual Policies are justified. Determining that Policies are reasonable and effective now and going forward is greatly compromised. In making modification this essential information should be added to the supporting text to all policies.

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.

WGCL is the entity responsible for bringing forward ambitious development proposals across the Wellcome Genome Campus. WGCL has detailed knowledge of the Campus, its operation, opportunities and constraints, as well as a wider interest in delivering significant investment across the Southern Cluster**.** It is therefore important that WGCL is able to participate in the Examination Hearing Sessions to assist the Inspector in considering whether the policies are effective, justified and capable of supporting the future growth and success of the science sector in Cambridge.

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