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 J/AW: Affordable Workspace and Creative Industries
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.

WGCL has not elected to make individual representations on all the policies of the Plan which individually, and cumulatively, reflect a significant challenge to the viability of new development. WGCL's position on the cumulative burden of these policies is set out in

the representation in respect of Policy I/ID. The exception to this approach (an overarching representation) is in relation to this policy.

As one of a handful of developers currently tackling the challenges of delivering new R&D floorspace on one of the Cambridge Science Parks, WGCL is compelled to input on this Policy. It may seem relatively innocuous on the face of it, and in isolation, but it is burdensome in the extreme given the specific circumstances on the Wellcome Genome Campus and the potential, cumulative position highlighted in the representation on Policy I/ID. WGCL underline a lack of faith in the high-level appraisal of viability across the Plan and CIL.

Nowhere in the evidence supporting the Plan is the case made for significant market failure in the science sector necessitating this burden upon those owning, providing and managing R&D employment space. To consider applying this Policy to the science parks, evidence needs to be assembled that points to the need for "cheap" space being a primary issue frustrating innovation and growth. WGCL are unaware of any such evidence.

There is plenty of competitive provision in and around Cambridge for newer/smaller companies in the sector, including the new BioLabs offer being delivered by WGCL. Downward pressure on rents is opening up lots of opportunity for good value space and incentivised deals. In WGCL's recent experience, it is the wrap-around support and services, much more than rental levels, which is the more likely determinant of occupier interest. Start-ups and scale-ups will expect to share the cost of the things they need, for example lab/science operations, access to expensive equipment they can share (but could not afford themselves), access to low-volume consumables, finance and commercial support. They want access to fundraising advice, mentoring, venture capitalists, angel investors and potential non-executive directors and advisors. These services and networks tend to come from full-service incubator and accelerator models, not discounted rental space where providers are then constrained to invest. Such a simplistic view of how best to facilitate investment in the science sector is potentially harmful; such a significant discount on rental across a sizable proportion of the offer may result in the more important wrap-around provision being diminished.

It is also unclear how the discounts have been arrived at and what the assumptions are underpinning the approach broadly, or in relation to individual and established locations. There is no indication that any regard has been had to wider site context, not least where there is already a lot of space occupied on a 'non-commercial' basis, supporting innovation and research. At the Wellcome Genome Campus there is 850,000 sq ft of space already owned by charitable and public institutions, on long leases. New space now being brought forward is to help commercial entities cluster and partner with these 'host' institutions and establish a sustainable business model for the Campus as a whole. The Campus cannot sustain any further subsidy to occupiers.

If a Policy of this sort is to be entertained, it needs to be far more sophisticated in terms of application, informed by full engagement with space providers in the relevant sectors to which it is applied. Baking-in discount and placing time limits on the discount is essential. In the science sector 'in perpetuity' provisions are likely to discourage progression into more 'mature' floorspace and may disadvantage the owner/investor, while the occupier flourishes. The burden then falls upon the owner to manage and direct occupation to avoid subsidising those who no longer need it. Occupiers in this sector are not easily relocated without significant fit-out cost, giving rise to further cost burden on the owner. The Policy will hinder the dynamism within the sector.

More widely, there is no necessity for the Council to operate and manage space, the market should be allowed to respond and innovate to meet the need for space at different price points, acknowledging that so often repurposed space, not new build space, unlocks far greater potential for affordable workspace. The risk here is stifling innovation in business models and creating a closed shop of providers, counter to the wider interests of owner and providers, harming viability and reducing income being channelled into provision of new space and meeting occupier needs.

WGCL acknowledge that there is some recognition in the supporting text to the Policy that fit-out costs associated with R&D may justify a reduced discount on grounds of viability, but in circumstances where there is clearly no reasonable basis to demand a discount in the first place, given the site specific considerations, the burden of costly and convoluted viability discussions, should not fall upon the developer, simply because the Policy fails to appropriately address the circumstances when it may be reasonable to apply it.

Please provide a 100 word summary of your representation.

Policy J/AW is not supported by sufficient evidence of need within the science and R&D sector and would impose a significant additional viability burden. WGCL contends that innovation is driven by specialist facilities, services and business support rather than discounted rents, and that mandatory affordable workspace provision could undermine investment, campus operations and delivery of new floorspace. The representation seeks the removal of the Wellcome Genome Campus from the policy's scope and requests greater flexibility, clarity and sector-specific justification for its application.

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.

WGCL request that the Wellcome Genome Campus is removed from the list of locations to which this policy applies.

In addition, as a general point, the Policy is not entirely clear in terms of distinguishing between different needs. Part 3 appears to relate to any provision (either 1 or 2 above), so blurs 'need' across different uses and might be interpreted as providing opportunity for proposals for R&D to provide space for creative industries or for R&D space needs to be integrated into a creative/cultural offer. This is, evidently, not practical in most locations. Further clarity and distinction would be helpful.

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