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
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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 S/AMC/WGC: Wellcome Genome Campus, Hinxton Area of Major Change
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 recognises that there is merit in two policies to address the potential at the Wellcome Genome Campus. This responds positively to representations made by WGCL on the Regulation 18 consultation plan, seeking distinction and clarity with regard to what is already consented and being delivered and what is in prospect, but less well defined. It does however present some challenges in navigating between the policies

and the related Plans. Some further modifications are necessary to remove inconsistencies, achieve clarity and ensure policies are effective. Additional modifications are also necessary to correct minor omissions and some drafting that is not as clear as it could be. The rationale for these changes should be self-explanatory. WGCL has approached these representations on the basis that Policy S/AMC/WGC layers additional potential onto the baseline position established by extant planning permissions (as reflected in Policy S/WGC) to recognise further potential for intensification and renewal, including on those parts of the existing Campus which are not within the area covered by the S/WGC Site Allocation (which corresponds with the limits of extant planning permissions for expansion).

WGCL supports the ambition of this Policy to realise the full potential of the Wellcome Genome Campus and ensure it is sustained over the decades ahead. The principle of replacement, intensification and expansion being guided through a Masterplan (as identified at Policy Point 1) represents a pragmatic approach to forward planning: it provides an appropriate basis for facilitating and considering future development in circumstances when opportunity is not yet fully crystallised and linked to the success of committed development. Minor amendment to Policy Point 1c is suggested to reflect the fact that provision of a substantial amount of new, modern R&T floorspace will mean some of the older buildings will be remodelled and repurposed or replaced, and there may well be loss of floorspace or inter-mixing of uses in some areas, more than compensated for by gain in others. As drafted the Policy is over simplistic and not reflective of the objectives of the Policy overall.

The requirement for a Masterplan to be agreed prior to approval of "any planning applications" is unnecessarily onerous and should be amended to ensure that it does not frustrate ‘business as usual’ operations across the Campus. As the Council are aware, the existing Campus has always, and will continue to adapt to progress maintenance and upgrades and make adaptations for occupiers, requiring regular interventions, which very often constitute development. The expansion progresses under a separate regime so needs no new masterplan. These must not be hindered by processes that need relate only to major change. A new masterplan is required to guide significant development beyond that encompassed by Policy S/WGC and should be tied into accordingly.

The preparation of a Master Plan, Place Book and Design Code is supported, in principle. However, Wellcome caution against overly prescriptive, detailed or drawn-out processes that risk unnecessarily slow, complex, repetitive or costly commitments. The approach needs to be proportionate and reflective of gradual, incremental evolution across the Campus. It is also suggested that Development Briefs might offer a useful alternative to coding, especially where change might arise in the context of one single building.

WGCL welcomes the revised wording relating to the Conference Centre.

WGCL supports the approach that residential homes are for Campus workers "as a first priority'. This is welcome improvement on previous drafting. It better reflects the existing controls on occupation and leaves some scope for adaptation to underpin delivery of homes on site.

Policy Points 1(m) and 1(o) should be reworded to support strategic public transport and active travel improvements, with contributions secured where necessary and proportionate to the scale and impact of development proposed.

Please provide a 100 word summary of your representation.

WGCL recognises that there is merit in two policies to address the potential at the Wellcome Genome Campus. However, WGCL considers that further modifications are necessary to remove inconsistencies, address minor omissions, improve drafting and ensure the policies are clear and effective. In particular, amendments are sought to provide greater flexibility for campus operations, redevelopment and the proportionate delivery of supporting infrastructure.

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's suggested amendment to the wording of Policy S/AMC/WGC is as follows (deletions are shown crossed through with additions in black, bold type; explanations and comments in square brackets):

Context
This Policy relates directly to and spatially overlaps with Policy S/WGC. Reference to Wellcome Genome Campus refers to the entire 'Policy Area' as relevant to both policies, incorporating the existing Campus west of the A1301, the associated parkland and wetlands, and the expansion land to the east of the A1301.

[This approach is suggested on the basis that the whole Campus including the Wetlands – 'open space and green infrastructure' - should sit within the broad 'Policy Area' for both WGC Policies and no part of Hinxton village should be within the Area (amend Figure 86 accordingly). All plans - the Policies Map and Fig 86, Fig 73 and Fig 74 need to be amended to be consistent]

Policy S/AMC/WGC layers additional potential onto the baseline position established by extant planning permissions (reflected in Policy S/WGC) to recognise further potential for intensification and renewal across all parts of the existing Campus as well as the area covered by the S/WGC Site Allocation.

Policy S/WGC embeds development proposals and opportunities that reflect development which is already permitted across the S/WGC 'Site Allocation' which incorporates a large area of 'Expansion Land' east of the A1301 and a part of the existing Campus, west of the A1301.

Both Policies should be read together to understand the full potential of the Campus, over the Plan period.

[This wording is suggested on the basis that the 'Site Allocation' applies to the red lined area shown on Figure 86 -Spatial Framework Plan].

1. *Development proposals for any significant scale of replacement, intensification and expansion* ***and for appropriate new development*** *(additional to that provided for in Policy S/WGC)* ~~*of existing buildings*~~ *at Wellcome Genome Campus,* ~~*and for appropriate new development*~~*, will only be supported where:*
   a. *A* ~~*site wide*~~ *Masterplan is prepared* ***for the Policy Area shown on the Policies Map*** *[assuming the boundary is amended] by the landowners in conjunction with the Council and in consultation with the local community and other stakeholders. The Masterplan should be broadly aligned with the indicative Spatial Framework Plan shown at Figure 86 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing and will be used as a basis for the consideration of subsequent planning applications. The Masterplan should be agreed by the Local Planning Authority prior to the approval of any planning applications* ***for significant change in land use or built form*** *(and may be subsequently updated by the landowners / promoters and agreed by the Local Planning Authorities);*
   b. *Given the scale and long term construction of the development, a site wide Place Book shall be prepared to establish the vision, place-making objectives and quality expectations and provide the foundation for the site wide Masterplan and,* ***where relevant****, Design Codes* ***or Design Briefs****.* ~~*The*~~ *Design Codes/****Design Briefs*** *will ensure that each phase of development positively contributes towards the high-quality placemaking outcomes expected.*
   c. *It is demonstrated that the reuse of existing buildings has been explored before considering expansion and appropriate new development, including the Conference Centre;*
   d. ~~*There is no net loss of*~~ *Class (E(g)* ~~*research and development office, relating to sciences, and workspace,*~~ ***including offices, research and development uses, and light industrial processes appropriate to the operation of the Campus, will remain the principal employment uses*** *reflecting the primary function of the Campus.*
   e. *Residential homes are for Campus workers as a first priority, and are* ~~*complimented*~~ ***complemented*** *with the necessary supporting uses, including retail, leisure, culture,* ***food and beverage outlets****, healthcare and education;*
   f. *They deliver a range of outdoor sports provision to meet identified local need;*
   g. *There is adequate provision for supporting services and facilities to support those working and visiting the site, including external amenity spaces;*
   h. *Meanwhile community uses and support for engagement is provided to support the integration of new communities with surrounding neighbours;*

i. *The design, including building heights, massing and materials, responds sensitively and positively to the existing built form and parkland setting, maintains and enhances connections with key landscape features, including unacceptable impacts on the Grade II* Listed Hinxton Hall, and nearby off-site heritage assets, and Hinxton Conservation Area;*

j. *Proposals maintain open buffers between the built areas of the site and retained agricultural uses and other open spaces, including a landscaped buffer with the River Cam;*

k. *Proposals take a sequential approach to site layout, with more vulnerable development being located outside of any areas at risk of surface water or fluvial flooding;*

l. *A site-specific flood risk assessment is prepared to support any proposed development. The FRA should consider any opportunities for reducing flood risk, including through the use of nature-based solutions;*

m. *Development* ***should support strategic public transport and active travel infrastructure (through financial contributions, directly related to the development proposed and proportionate to its scale and impact)*** ~~*rapid public transit to*~~ ***deliver*** ***and improved connectivity between the Campus*** ~~***with***~~ ***and Whittlesford Parkway Station, and if successfully delivered, the proposed South Eastern Travel Hub.***

n. *Further work, in the form of a Transport Assessment, is undertaken to assess the impacts of the local transport network, utilising public transport and active travel connections. The transport modelling must include impacts on Uttlesford District Council's road network and the Stump Cross junction (A11/B184)*~~*; and*~~

~~*o. Financial contributions, secured through a legal agreement, are used to enable strategic public transport and active travel schemes in the south-east corridor appropriate to the scale and nature of the development.*~~

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