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		Errin Marshall
Organisation (where relevant)	Trinity College, Cambridge	DP9 Ltd
Job Title (where relevant)		Associate
Address, including Post Code		20 Station Road, Cambridge, CB1 2JD
Telephone		07521391375
Email address		Errin.marshall@dp9.co.uk

* 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
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	No – in relation to Policy J/AW

Sound	No – in relation to Policy J/AW

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 submitted by DP9 Limited ('DP9') to the Greater Cambridge Shared Planning Team ('GCSP') on behalf of Trinity College, Cambridge ('TCC') as the Freehold Owner, and in consultation with other long leaseholders in respect of the above address (the 'site') to the Regulation 19 Greater Cambridge Local Plan consultation ('eLP'). TCC are a highly significant landowner within Cambridge and the wider area, with one of their major assets being Cambridge Science Park, located off Milton Road to the north of the city.

Trinity's relationship with Cambridge stretches back almost five centuries, and that history has made the College not merely a resident but a custodian of the city and University, with a depth of investment in their continued success that few other participants in this process can claim. It is this long-term stewardship role that informs TCC's approach to the masterplanning of Cambridge Science Park.

DP9 is instructed as planning advisor to TCC as part of the wider masterplanning work currently being undertaken across Cambridge Science Park. An outline planning application for up to 771,000sqm of floorspace (the CSP Outline Planning Application or the OPA) is currently being determined by the Local Planning Authority. TCC welcomes the opportunity to make representations on the emerging Plan, which will play a key role in shaping the future planning framework for Cambridge Science Park and the wider North East Cambridge area.

Cambridge Science Park is a globally renowned centre of scientific excellence, founded in 1970 by Trinity College, Cambridge. It is the largest commercial employment site within Greater Cambridge by employment floorspace, comprising approximately 250,000sqm of predominantly research and development floorspace and supporting the employment of approximately 7,500 people across more than 170 companies focused on science and innovation, including but not limited to AI and digital, life sciences, creative industries and clean energy.

TCC made representations to the 2021 First Proposals Consultation and again to the January 2026 Regulation 18 Consultation, setting out deep concerns regarding the treatment of Cambridge Science Park within the emerging Plan. TCC is pleased to record that many of these concerns have been substantively addressed through subsequent iterations of the Plan, and in particular through the Regulation 19 Proposed Submission version (eLP) now published.

TCC notes that this policy has changed materially since the Regulation 18 stage, moving from a high-level approach to a quantified and mandatory requirement: 10% of net

additional office/R&D floorspace above 1,000sqm, at a minimum 30% discount to market rent, in perpetuity, with Cambridge Science Park expressly named at supporting paragraph 8.40. As this quantified approach was not the subject of TCC's previous representations, TCC wishes to raise the following points for consideration:

- TCC has previously raised concerns, in the course of ongoing s.106 discussions relating to the Park's redevelopment, regarding the deliverability of an affordable workspace obligation of this kind alongside the Park's other policy obligations (including net zero carbon, water efficiency, biodiversity net gain, and transport mitigation contributions) and reserves its position on the detail of this requirement pending further viability testing through the OPA process.
- The Plan does not explain why the discount is to apply in perpetuity, rather than for a defined period subject to review, which is a more common approach in comparable policies elsewhere. TCC requests that the Councils set out the viability evidence supporting a permanent, rather than time-limited, obligation, particularly given the cumulative effect of the wider policy requirements applying to CSP intensification schemes.
- As noted above, TCC also requests clarity on how this policy interacts with the separate 'appropriate quantum' wording at Policy S/AMC/NEC, criteria 3(e).

The eLP has not been shown, through viability evidence, to be deliverable where this requirement is applied cumulatively alongside Cambridge Science Park's other policy obligations (including net zero carbon, water efficiency, biodiversity net gain and transport mitigation contributions). In the absence of such evidence, TCC does not consider the policy has been demonstrated to meet the Effective test at paragraph 36 (c) of the NPPF as it applies to sites of this scale and complexity and reserves the right to submit viability evidence ahead of Examination.

In terms of the perpetuity point raised above, this is a matter going to whether the policy is Justified: national Planning Practice Guidance on viability expects any above-standard requirements of this kind to be tested and evidenced as deliverable, and no such evidence has been published in respect of a permanent rather than time-limited obligation.
In support of this position, TCC draws the Councils' attention to detailed viability representations submitted with this response by Bidwells LLP, on behalf of a consortium of commercial development clients, responding specifically to the viability of Policy J/AW (Annex 1). This additional evidence reviews the Council's Local Plan Viability Assessment (LPVA) prepared by Aspinall Verdi and raise a number of concerns of direct relevance to the points raised above, including that:

- the LPVA's commercial appraisals test discount rates and floorspace percentages double the policy-compliant requirement, such that no results are reported at the actual policy-compliant figures;
- certain value assumptions (including laboratory rents and yields) sit towards the optimistic end of the achievable range, while cost assumptions (including Benchmark Land Values, net zero costs and infrastructure contributions) appear to be drawn from generic or non-Cambridge sources rather than commercial-specific evidence;
- Brownfield redevelopment costs and constraints are understated relative to Greenfield testing; and

- the evidential basis for both the proposed 1,000 sq m office/R&D threshold and the in-perpetuity duration of the discount is limited.
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TCC considers this evidence directly relevant to whether Policy J/AW, and the LPVA on which it relies, can be shown not to meet the Justified and Effective tests at paragraph 36 of the NPPF.

Please provide a 100 word summary of your representation.

TCC notes that Policy J/AW now imposes a mandatory affordable workspace requirement: 10% of qualifying office/R&D floorspace at a minimum 30% rent discount in perpetuity. TCC is concerned that its cumulative impact alongside net zero, water, biodiversity and transport obligations has not been demonstrated as viable for Cambridge Science Park. It seeks evidence supporting the permanent discount and clarification of its relationship with Policy S/AMC/NEC. Bidwells' accompanying viability evidence identifies optimistic assumptions, understated brownfield costs, limited evidence for the threshold and duration, and unsuitable appraisal testing. TCC considers the policy insufficiently justified and effective under NPPF paragraph 36.

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.

- CSP Reg 19 Representations Letter
- Bidwells Affordable Workspaces Letter

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.

The Plan does not explain why the discount is to apply in perpetuity, rather than for a defined period subject to review, which is a more common approach in comparable policies elsewhere. TCC requests that the Councils set out the viability evidence supporting a permanent, rather than time-limited, obligation, particularly given the cumulative effect of the wider policy requirements applying to CSP intensification schemes.

As noted, TCC also requests clarity on how this policy interacts with the separate 'appropriate quantum' wording at Policy S/AMC/NEC, criteria 3(e).

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.

Because we have outstanding concerns with the contents of the draft local plan.

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