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SUBMITTED BY EMAIL

Greater Cambridge on behalf of Cambridge City Council and South Cambridgeshire District Council Local Plan Regulation 19 Representations

Proposed Reg. 19 Response

Introduction

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.

These representations are accordingly more limited in scope than those previously submitted, and focus on the following policies:

- Policy S/JH: New jobs and homes
- Policy S/AMC/NEC: North East Cambridge (Area of Major Change)
- Policy WS/MU: Meanwhile uses
- Policy J/NE: New employment development proposals
- Policy WS/IO: Creating inclusive employment and business opportunities through new developments
- Policy J/AW: Affordable workspace and creative industries
- Policy J/EP: Supporting a range of facilities in employment parks
- Policy BG/BG: Biodiversity and geodiversity
- Policy BG/PO: Protecting open spaces
- The Local Plan Policies Map

Policies are reviewed in accordance with the transitional arrangements as detailed within Annex A of the NPPF 2026, and in accordance with the December 2024 NPPF. However, it is noted and of relevance that for the purposes of decision-making the August 2026 NPPF takes immediate effect and this is reflected accordingly within our responses.

Each eLP policy is addressed in turn below.

Policy S/JH: New Jobs and Homes

TCC notes that the eLP now confirms a jobs figure of approximately 73,300 additional jobs and a housing requirement of approximately 50,000 homes (of which approximately 37,865 are already committed) over the 2024–2045 plan period. TCC's previous representations made clear that continued growth at Cambridge Science Park should not be treated as reliant on the delivery of new homes within North East Cambridge. Local Plans in Greater Cambridge have allocated housing land within sustainable transport corridors and commuting distance to Cambridge Science Park over the preceding decades, and this pattern should and does continue in the eLP. Growth locations such as Waterbeach benefit from excellent public and active transport connections to Cambridge Science Park, reinforcing this established and sustainable pattern of development.

TCC welcomes this change, which resolves its previous objection, and confirms it has no further comment on this policy at this stage.

Policy S/AMC/NEC: North East Cambridge (Area of Major Change)

Changes Welcomed Since Regulation 18

TCC welcomes the significant restructuring of Policy S/AMC/NEC since the Regulation 18 stage, and in particular:

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- the replacement of the fixed parking cap with a trip budget expressed as peak-hour vehicle movements, monitored and managed rather than fixed at the outset;
- the removal of the previously proposed 'no vehicular through route' restriction and the rigid '5-minute walk' test, both of which TCC considered unjustified and unnecessarily restrictive of the Park's continued operation;
- the express decoupling of Cambridge Science Park's continued employment intensification from both housing delivery and the relocation of the Cambridge Waste Water Treatment Plant ('CWWTP'), with supporting paragraph 3.1.83 now confirming the area 'remains a priority for coordinated regeneration, investment and intensification of innovation-led employment uses' despite ongoing uncertainty regarding the CWWTP's future; and
- the inclusion, at Policy S/AMC/NEC Criteria 3, of express policy support for 'new or intensified Commercial and Research & Development (E(g)(i) and E(g)(ii)) at existing campuses, including Cambridge Science Park.';
- the revision of Criteria 12(e) to require proposals to 'avoid inward-facing or campus-style layouts and promote openness, collaboration and inclusivity, maximising opportunities for public access', removing the previous blanket requirement for all roof terraces and cafes to be open to the public, which TCC considered unworkable given the nature of the science undertaken within certain buildings; and
- the replacement, at Criteria 28, of the previous requirement for a single comprehensive Outline Planning Application covering the whole of the NEC Area of Major Change with a requirement for 'site- or phase-based masterplans...with supporting parameter plans and design codes', which TCC considers properly reflects the reality of a multi-owner allocation and is consistent with the approach TCC is bringing forward for Cambridge Science Park through the OPA.

These changes substantively address the concerns raised in TCC's previous representations, and TCC is grateful to the Councils for the engagement that has informed them.

Notwithstanding this progress, TCC wishes to raise the following points for consideration ahead of Examination.

Criteria-by-Criteria Review Against the Outline Planning Application

To assist the Councils, TCC has reviewed each criterion of Policy S/AMC/NEC against the masterplan and strategy being brought forward through the CSP Outline Planning Application ('the OPA'). This review is summarised in the table below, using the SUPPORT / COMMENT / OBJECT convention adopted throughout these representations, together with an indication of relevance where a criterion does not apply to the Site. Criteria 4 (Cowley Road Industrial Estate) and Criteria 6 (Nuffield Road Industrial Estate) fall outside the CSP site boundary and are not reviewed, as they do not directly affect the OPA. The matters flagged as COMMENT or OBJECT are discussed in further detail in the sections which follow the table.

Ref	Policy requirement	Position	Relationship to the OPA
1(a)	Contribute to Greater Cambridge's role in research, innovation and knowledge-based industries.	SUPPORT	Core purpose of the OPA; CSP is the largest such campus in Greater Cambridge and the OPA is designed to grow this role.

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Ref	Policy requirement	Position	Relationship to the OPA
1(b)	Support integration of complementary uses (residential, mid-tech, industrial).	SUPPORT	The masterplan includes complementary ancillary uses (e.g. gym, hotel, retail); residential is not a primary component but is not precluded.
1(c)	Deliver high-quality, inclusive, distinctive places integrating with the wider City.	SUPPORT	Reflected in the masterplan's place-making strategy, including the proposed 'Park of Science' and wider public realm opening the Park to the community.
1(d)	Deliver/contribute to active travel and PT measures, building on Cambridge North Station and the Guided Busway.	SUPPORT	Directly reflected in the OPA's transport strategy and its reliance on pooled/authority-led delivery; see Movement section below.
2	Create mixed-use places structured around activity nodes (working, learning, leisure, residential where conditions allow).	SUPPORT	The masterplan's district/local centre functions as such an activity node; residential is not a core OPA component, which the 'where conditions allow' wording accommodates without conflict.
3(a)	Facilitate innovation, knowledge exchange and collaboration between businesses.	SUPPORT	Central to the OPA's design rationale, including shared collaboration space and the Cambridge Science Centre.
3(b)	Efficient use of land through intensification, rationalising surface parking, increased heights/densities.	SUPPORT	The organising principle of the OPA, see 'Efficient Use of Land' section below.
3(c)	Flexible design to allow floorspace to be reconfigured as business needs evolve.	SUPPORT	Consistent with the adaptable building typologies proposed in the masterplan.
3(d)	Support inclusive growth for start-ups/SMEs through flexible/smaller units and shared space.	SUPPORT	Reflects CSP's established range of workspace typologies, from incubator space to bespoke HQ buildings.
3(e)	Provide an appropriate quantum of affordable or managed workspace.	COMMENT	Overlaps with Policy J/AW; see 'Affordable Workspace' section below, deletion of 3(e) requested.
3(f)	Provide facilities/services/amenities extending activity through the day.	SUPPORT	Reflected in enhanced F&B, wellbeing and collaboration space proposed through the OPA.
3(g)	Contribute to smart city, skills and local employment initiatives.	SUPPORT	Consistent with CSP's existing and proposed links to Cambridge Regional College and local schools, and support (elsewhere) for Policy WS/IO.
5	Support residential development that complements employment uses and integrates with the area.	COMMENT	Of limited direct relevance: the OPA is predominantly commercial, reflecting the Site's location and constraints; no objection in principle.
7	Development affecting Cambridge Regional College must support its role and sustainable access.	SUPPORT	Consistent with CSP's existing links to CRC; improved sustainable access would complement the OPA's active travel strategy.
[stray text]	'The development of North East Cambridge must do the following:' (between Criteria 7 and 'Context').	COMMENT	Drafting point only, sentence appears orphaned and unrelated to surrounding text; recommend deletion for clarity (NPPF 2024, para 16(d)).
8	Demonstrate ability to overcome environmental constraints and protective designations.	COMMENT	Mostly targeted at legacy contamination/CWWTP-related land; the OPA will demonstrate compliance where relevant to the Site.
9	Submit a Remediation Strategy where contamination is known/suspected.	SUPPORT	Standard requirement; to be addressed through the OPA's Environmental Statement as necessary.
10	Agent of Change assessment within Minerals and Waste Consultation Area / CWWTP Odour Zone.	COMMENT	Relevant given proximity to the CWWTP; TCC requests clarity on the geographic extent of the Odour Zone as it applies to CSP (predominantly west of Milton Road).
11	Do not preclude operation/maintenance of sewer pumping stations.	SUPPORT	No conflict identified with the OPA.

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Ref	Policy requirement	Position	Relationship to the OPA
12(a)	Compact mid- to higher-density development making efficient use of land.	SUPPORT	Directly reflects the OPA's ambition to intensify built form across the Site.
12(b)	Increased height in well-justified positions (activity centres, transport nodes, corridors).	COMMENT	Clarification sought that the approved CSP masterplan will itself constitute the relevant justification for subsequent phases; see 'Height and Density' section below.
12(c)	Innovative, adaptable, durable building typologies.	SUPPORT	Reflected in the OPA's flexible, future-proofed building typologies.
12(d)	Horizontal mixed uses/active frontages at ground and lower levels.	SUPPORT	Reflected in proposed ground-floor retail, F&B and community uses along key routes.
12(e)	Avoid inward-facing/campus-style layouts; maximise opportunities for public access.	SUPPORT	Welcomed softening of previous wording (see 'Changes Welcomed' above); consistent with the 'Park of Science' concept and wider public access strategy.
12(f)	Residential design to support amenity/environmental quality where residential is proposed.	N/A	Limited direct relevance given the OPA's predominantly commercial focus.
13	Integrate large-footprint lab/mid-tech buildings into the urban fabric with active frontages.	SUPPORT	Directly reflects the design approach for large R&D buildings within the OPA masterplan.
14	Deliver/contribute to an interconnected green infrastructure network.	SUPPORT	Reflected in the OPA's green and blue infrastructure strategy, including the Park of Science.
15	Demonstrate contribution to a network of well-designed streets/spaces and permeability.	SUPPORT	Central to the masterplan's public realm and permeability strategy.
16(a)	Protect/enhance Bramblefields Local Nature Reserve.	SUPPORT	The OPA proposes appropriate buffers and sensitive layout adjacent to the reserve; no conflict identified.
16(b)	Deliver habitat/water quality improvements to the First Public Drain.	SUPPORT	The Drain runs through the Site; the OPA's SuDS and naturalisation strategy is designed to deliver these improvements.
16(c)	Protect/enhance the Milton Road Hedgerow City Wildlife Site.	SUPPORT	Retained as a continuous corridor fronting Milton Road within the masterplan.
16(d)	Joined-up green infrastructure across adjacent sites, phases and ownerships.	SUPPORT	TCC's single freehold ownership of CSP assists coordination; cross-boundary coordination with neighbouring landowners will be pursued through the OPA process.
17	Transport Assessment; comply with trip budget and mode share targets; prioritise active travel.	COMMENT	Principle supported; evidence base, definition and terminology issues raised — see 'Movement' section below.
18	Coordinated measures to prevent parking displacement, incl. on-street control and monitoring.	COMMENT	See 'Parking Displacement' section below.
19	Remove barriers to movement (Milton Road, Guided Busway, King's Hedges/East Chesterton/Fen Road/Milton, Cambridge North).	SUPPORT	Directly supported by the OPA's active travel and connectivity strategy.
20	Sustainable last-mile delivery measures (logistics hubs, innovative kerbside/digital measures).	COMMENT	Not directly delivered by the OPA; flexible, proportionate application requested — see section below.
21	Manage increased HGV/commercial-vehicle movements.	COMMENT	Not considered a CSP-relevant matter; confirmation of proportionate application requested.
22(a)	Contribute to social infrastructure identified in the IDP.	SUPPORT	Consistent with the pooled-contribution approach preferred by TCC; see supporting-text discussion below.

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Ref	Policy requirement	Position	Relationship to the OPA
22(b)	Enhance/expand neighbourhood facilities (shops, F&B, childcare).	SUPPORT	Reflected in the enhanced amenity offer proposed through the OPA.
22(c)	Promote inclusive access to green space, sport and community activity.	SUPPORT	Reflected in the Park of Science and Cambridge Science Centre.
23	Comply with coordinated delivery/phasing; do not prejudice comprehensive development.	SUPPORT	TCC's single freehold ownership of CSP is well placed to secure comprehensive, coordinated delivery through one Outline Planning Application.
24(a)-(d)	Safeguard land/routes; coordinate construction logistics; do not prejudice adjoining sites/existing strategic assets (CWWTP, Railheads, Waste Transfer Station).	SUPPORT	Directly addressed by the whole-site OPA approach, which is specifically structured to secure comprehensive delivery.
25(a)-(b)	Compatibility with innovation district activities; phased operation; do not unreasonably constrain existing/future activities.	SUPPORT	Reflects CSP's continued operation as an active campus through a phased, multi-decade build-out.
26(a)-(b)	Phasing and infrastructure strategies; interim measures between phases.	SUPPORT	Integral to the OPA's Phasing and Infrastructure Delivery Plan.
27(a)-(c)	Early phases delivered as coherent, functional places with interim provision where necessary.	SUPPORT	Reflected in the OPA's approach to bringing forward early public realm and amenity ahead of full build-out.
28	Site-/phase-based masterplans with parameter plans and design codes for comprehensive redevelopment.	SUPPORT	Welcomed change (see 'Changes Welcomed' above); directly consistent with the OPA's parameter-plan-led approach.
29	Long-term stewardship, management and maintenance, with community participation.	SUPPORT	TCC, as long-term freeholder, is well placed to secure an appropriate Stewardship Strategy through the OPA.

Objectives and Place Identity (Criteria 1)

Criteria 1(d), requiring development to deliver and/or contribute towards measures which enhance and prioritise active travel and public transport connections, is SUPPORTED. The reference to 'delivering and/or contributing to measures' is particularly welcomed, as it reinforces an approach based on pooled contributions and authority-led delivery, which is consistent with the strategy TCC is bringing forward through the CSP Outline Planning Application ('the OPA'). The recognition of the Park's existing strategic connectivity, provided by Cambridge North Railway Station and the Cambridgeshire Guided Busway, is also supported and reinforces the case for continued intensification at this location.

Efficient Use of Land (Criteria 3(b))

Criteria 3(b), which supports efficient use of land through intensification, including rationalising surface car parking to increase building coverage and increased heights and housing and employment densities where appropriate, is SUPPORTED and is a central organising principle of the emerging CSP Masterplan and the OPA, which is founded on intensifying the Park's built form and reducing its reliance on surface car parking in order to accommodate substantially increased commercial floorspace.

TCC notes, as a minor drafting point relevant to the effectiveness of the Policy, that the sentence immediately following Criteria 7 (and before the 'Context' sub-heading introducing Criteria 8), 'The development of North East Cambridge must do the following:', does not appear to relate to the

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surrounding text and may have been included in error. TCC requests that this be reviewed and, if erroneous, removed for clarity, consistent with the requirement in paragraph 16(d) of the NPPF 2024 that policies be clearly written and unambiguous.

Affordable Workspace – Policy Overlap (Criteria 3(e))

Policy S/AMC/NEC Criteria 3(e) requires intensification proposals to provide 'an appropriate quantum of affordable or managed workspace', a term which is not defined. Policy J/AW separately sets a specific, quantified standard for affordable workspace and expressly names Cambridge Science Park. TCC requests confirmation that Policy J/AW is intended to be the applicable policy standard for affordable workspace at CSP, and that Criteria 3(e) of Policy S/AMC/NEC should be removed, to avoid two separate and potentially inconsistent requirements applying to the same development.

Clarity on this point is necessary for the Plan to be effective, and consistent with paragraph 16(d) of the NPPF 2024, which requires policies to be clearly written and unambiguous so that it is evident how a decision-maker should react to development proposals. TCC therefore suggests that Criteria 3(e) be deleted to avoid unnecessary duplication.

Height and Density Criteria (Criteria 12(b))

Policy S/AMC/NEC Criteria 12(b) permits increased height in 'well-justified positions' (activity centres, transport nodes and key corridors), without further definition, relying instead on site-by-site testing under Policy GP/ST and Appendix H. TCC does not object to a design-led, context-based approach in principle, but notes that this leaves limited upfront certainty for landowners and occupiers bringing forward individual phases of a comprehensive, multi-owner masterplan such as CSP. TCC would welcome confirmation that the approved CSP masterplan, once agreed through the OPA process, will itself constitute the relevant 'justification' for the purposes of Criteria 12(b) and Policy GP/ST for subsequent phases and reserved matters applications.

TCC raises this as a matter requiring clarification rather than a soundness objection, and does not consider it, on its own, to render the Policy unjustified or ineffective. TCC nonetheless proposes the following rewording to put the position beyond doubt:

> *"12b. Locate increased building heights in well-justified positions, including* ***(but not limited to)*** *activity centres, transport nodes and key movement corridors, where they reinforce legibility, assist wayfinding and contribute positively to the wider townscape;"*

Movement: Trip Budget Evidence, Definition and Terminology (Criteria 17)

TCC accepts the principle of CSP operating within peak-hour vehicular trip budgets, and supports the monitor-and-manage approach set out in Criteria 17, which should enable continued growth at the Park while ensuring the majority of additional movements are accommodated through sustainable modes. However, TCC raises the following points on the drafting and evidential basis of Criteria 17.

Evidence trail

The trip budget figures at Policy S/AMC/NEC Criteria 17.1 (Milton Road: 3,900 AM / 3,000 PM peak; Kings Hedges Road: 780 AM / 754 PM peak) are presented as 'the agreed trip budget' without the qualifying language used elsewhere in the Plan for comparable strategic allocations, which typically

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confirms that a definitive trip budget based on detailed evidence must still be agreed with the Local Highway Authority prior to submission. Nor does the supporting text identify the specific transport modelling underpinning these particular figures, beyond a forward reference to the NEC Transport Position Statement (or successor document).

TCC requests that this evidence be published or, in the alternative, that the same 'indicative, subject to confirmation' wording applied elsewhere in the Plan be applied here. TCC further notes that the trip budget and its evidence base should be tested for consistency against the transport case currently being advanced in parallel through the CSP Outline Planning Application, to avoid the risk of two inconsistent positions being reached on the same road network.

This goes to whether the Plan is justified: paragraph 36(b) of the NPPF 2024 requires policies to be based on proportionate evidence, and as presently drafted the specific trip budget figures cannot be traced to a published evidence source.

Clarity of the figures

The figures at Criteria 17.1 also require clarification. It is TCC's understanding that the Milton Road and Kings Hedges Road figures are intended to represent the total vehicles entering the NEC area across the (multiple) access points on each road, and that these are peak-hour figures; neither point is currently stated. In addition, the Policy does not disaggregate the NEC-wide budget across individual sites. TCC recognises that, regardless of the overall NEC figure, individual development proposals will still require their own site-specific trip budget, and considers that the Policy would benefit from explaining how a site-specific budget is to be derived from the NEC-wide figure, even if only by reference to the evidence to be agreed. TCC notes that the OPA has, in effect, already established a site-specific trip budget for CSP that sits within the wider NEC trip budget, and welcomes the opportunity to work with the Councils to ensure the Policy properly reflects that relationship.

Use of the term 'agreed'

Criteria 17 requires development to 'comply with the agreed mode share targets set out in the NEC Transport Position Statement (or successor document)'. TCC supports the mode share targets in principle, and has developed a transport strategy for CSP that incorporates them. However, TCC considers 'compliance' to be the wrong test in this context: compliance should be with the trip budget, and a higher or lower car driver mode share than that set out in the Position Statement should remain acceptable provided the trip budget is maintained. TCC also notes that the repeated use of the word 'agreed' throughout Criteria 17, in relation to both the trip budget and the mode share targets, is not clearly attributed to any party, and requests that the Policy make clear with whom, and by what process, these figures are to be agreed.

Infrastructure delivery (Criteria 17, 'deliver and/or contribute towards')

TCC supports the remaining Movement criteria requiring development to prioritise walking, cycling and public transport in low-traffic streets and neighbourhoods; to minimise car parking provision and demand; to prioritise measures promoting modal choice and interchange, including new or improved mobility hubs; and to support a direct, legible walking and cycling network with strong connections between adjacent sites, phases and ownerships.

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In relation to the requirements to 'deliver and/or contribute towards' NEC-wide and strategic transport infrastructure identified in the Infrastructure Delivery Plan ('IDP') and NEC Transport Position Statement, TCC considers that it is properly for individual proposals to demonstrate what is necessary and deliverable for their own development, having regard to the IDP and Position Statement, rather than for the Policy to imply that all identified measures fall to be delivered by every proposal. Some measures identified in the IDP and Position Statement are already delivered, and others are planned and will come forward regardless of NEC-related development; this in itself reinforces the case for NEC, and CSP in particular, as a strong location for growth. TCC requests that the supporting text make clear that proposals should refer to the IDP and Position Statement and set out those specific measures which the proposal can deliver and/or contribute towards, which TCC understands is broadly the intended effect but which would benefit from being stated explicitly.

The requirement to include monitoring and review mechanisms, secured through planning conditions and/or obligations, is SUPPORTED.

Parking Displacement (Criteria 18)

Criteria 18 requires proposals to set out coordinated measures to prevent parking displacement, including control of on-street parking where necessary, and to establish a robust approach to monitoring. TCC considers this an unusual requirement to place on individual development proposals. A well-designed mode share and parking strategy for CSP should itself minimise the risk of displaced parking, without the need for a distinct displacement-control mechanism to be secured by each proposal. Where on-street parking restrictions are required, TCC considers that the Local Highway Authority, as the body responsible for the public highway, should lead on securing them, rather than this being a matter for individual planning applications to resolve. TCC also queries how compliance with a monitoring requirement of this kind could reliably be attributed to a specific development, given the number of sites and access points across NEC, and requests that Criteria 18 make clear that any restrictions on Park and Ride provision are excluded from the scope of 'parking displacement'.

Removing Barriers to Movement (Criteria 19)

TCC SUPPORTS Criteria 19 and the objective of removing existing barriers to movement across NEC by securing and/or contributing to new and improved connections, including crossings of Milton Road (noting that the current wording, requiring grade-separated options 'where feasible and appropriate', is considered sufficiently flexible and does not inappropriately bias the outcome towards grade separation), safe crossings of the Cambridgeshire Guided Busway, connections to King's Hedges, East Chesterton, Fen Road and Milton, and improved access to Cambridge North Station and the surrounding employment areas.

Last-Mile Deliveries and HGV Movements (Criteria 20–21)

TCC notes the requirements at Criteria 20 for proposals to secure and/or contribute to measures maximising sustainable last-mile deliveries, including site logistics hubs and innovative kerbside and digital logistics measures. These are not measures that the CSP OPA is directly bringing forward through the application, however Cambridge Science Park Management Team are continually looking at measures to improve these matters, and TCC requests that the Policy make clear that such

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requirements will be applied flexibly and proportionately, having regard to the nature, scale and operational requirements of individual sites.

Similarly, Criteria 21, requiring proposals with increased HGV or commercial-vehicle movements to demonstrate how these will be managed, is considered as part of the Design Code submitted with the OPA (in so far as it relates to servicing and deliveries).

Supporting Text: Recognition of NEC's Role and Approach to Infrastructure (Paragraphs 3.1.81, 3.1.86, 3.1.88–3.1.89)

TCC SUPPORTS paragraph 3.1.81, which recognises NEC as incorporating 'a nationally significant cluster of research, technology and knowledge-intensive employment uses' and highlights the excellent strategic connectivity provided by Cambridge North Station and the Cambridgeshire Guided Busway, underpinning an approach that prioritises active travel and public transport over reliance on the private car.

TCC also SUPPORTS paragraph 3.1.86, which recognises the scope to further develop the area's strengths through intensification of existing commercial sites, complemented by improvements to public transport, interchange, and pedestrian and cycling integration, and which supports the continued growth of the NEC innovation cluster.

In relation to paragraph 3.1.88, TCC supports the recognition that development will require delivery of, or financial contributions towards, a range of on-site, local and strategic infrastructure, and considers the reference to 'delivery of or financial contributions towards' helpful in pointing towards pooled contributions and authority-led delivery, consistent with TCC's approach through the OPA. TCC suggests that the broader term 'measures' may in places be more appropriate than 'infrastructure', to ensure that non-physical interventions (for example, additional bus services) are clearly captured within the scope of what proposals may contribute towards.

TCC further SUPPORTS paragraph 3.1.89 and its recognition that not all measures identified to improve permeability and connectivity across NEC can be directly delivered by individual development proposals. TCC considers this supports the principle of pooled contributions towards measures delivered by the local authorities, and supports the stated priority for active travel improvements, which reinforces the case for local measures being delivered early rather than funding being directed solely towards larger strategic interventions.

TCC also SUPPORTS the flexible, coordinated framework described at paragraph 3.1.82, which explicitly builds on 'the established successes of the existing science parks'. Finally, TCC notes that paragraph 3.1.87 does not identify CSP as contributing towards the circa 650 homes referenced as deliverable elsewhere in NEC, which is consistent with the predominantly commercial focus of the OPA.

Figure 38: Indicative Spatial Framework – Plan Accuracy

In addition to the soundness matters raised above, TCC identifies the following as a plan accuracy point, relevant to whether the Plan has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. This point does not relate to the Policies Map, but to Figure 38.

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The road network shown on Figure 38 is not identified in the accompanying key or legend, such that it is not possible to confirm from the plan alone what status is intended for the lines shown running through Cambridge Science Park, whether these represent an existing, committed, or merely indicative alignment.

As drawn, the plan appears to fix the Park's existing internal loop road in its current alignment. This is inconsistent with the masterplan currently being promoted through the CSP Outline Planning Application, which specifically seeks to reconfigure and improve the loop road as part of moving the Park away from the inward-facing, campus-style layout that Policy S/AMC/NEC itself identifies as a matter to be addressed through comprehensive redevelopment (see Criteria 12–13 of that Policy). An adopted plan that appears to fix the existing road alignment therefore risks sitting in direct tension with both the OPA currently before the Councils and the Plan's own stated built form objectives for the Site.

TCC requests that Figure 38 be updated to:

- include the road network within the key/legend so that its status is unambiguous; and
- either remove the fixed loop road alignment from the adopted figure, or add clarifying text confirming that the alignment shown is indicative only.

This is a straightforward correction, but one which TCC considers important to resolve prior to submission for Examination, to avoid an unintended conflict between the adopted Plan and the Outline Planning Application.

Conclusion

TCC welcomes the substantial progress made to Policy S/AMC/NEC since the Regulation 18 stage, and in particular the removal of several requirements which TCC considered unjustified and unnecessarily restrictive of the continued operation and growth of Cambridge Science Park. The matters raised above are put forward to assist the Councils in ensuring that the Policy is sound, effective and consistent with national policy ahead of Examination, and TCC would welcome the opportunity to discuss any of these points further, including in relation to establishing an appropriate, well-evidenced trip budget for the Site.

Policy WS/MU: Meanwhile Uses

TCC welcomes the retention of this policy, which will assist in supporting appropriate interim uses across the Park during the phased delivery of the masterplan. No further comment is offered at this stage.

Policy J/NE: New Employment Development Proposals

TCC welcomes the retention of this policy and has no substantive comment at this stage, subject to confirmation that the evidence base underpinning it (including the Employment and Housing Needs Update 2024–2045 and the Growth Sectors Study) remains unchanged from that reviewed in TCC's Regulation 18 representations. TCC reserves the right to comment further should updated evidence be published ahead of Examination.

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Policy WS/IO: Creating Inclusive Employment and Business Opportunities Through New Developments

TCC supports the principle of this policy, which requires developments of 1,000sqm gross or above to prepare and implement an Employment and Skills Plan for both the construction and occupation phases and secures 20% of construction-phase jobs for local residents. This is directly relevant to the phased redevelopment of Cambridge Science Park. Given the Park comprises multiple ownership plots brought forward by different developers and long leaseholders over an extended period, TCC requests confirmation that compliance can be secured flexibly at masterplan level, for example through a single, Park-wide Employment and Skills strategy agreed as part of the s.106 obligations for the OPA, rather than requiring a separate standalone Plan for each individual plot, which would risk unnecessary duplication and inconsistency across the Park.

Without such confirmation, there is a risk the policy cannot be Effectively implemented across a site in multiple ownerships, contrary to paragraph 36 (c) of the NPPF 2024.

Policy J/AW: Affordable Workspace and Creative Industries

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

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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.

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.

Policy J/EP: Supporting a Range of Facilities in Employment Parks

TCC welcomes the retention of this policy, which supports appropriately scaled leisure, food and drink, social and collaboration facilities within business parks where these are ancillary or complementary to the employment use. This aligns closely with the amenity-led approach being brought forward through the CSP masterplan and OPA, and TCC has no further comment at this stage.

Policy BG/BG: Biodiversity and Geodiversity

TCC welcomes the removal of the previous North East Cambridge-specific requirement for a fixed 20% on-site biodiversity net gain, which TCC had objected to as unjustified in the context of a constrained, already-developed urban site. This has been replaced by the general, Plan-wide Policy BG/BG, which sets a minimum 20% requirement for major development to be met on-site 'where feasible and effective', with an off-site route available once on-site options have been evidenced as exhausted. TCC welcomes this greater flexibility.

TCC does, however, wish to note a secondary point for the Councils' consideration. The supporting text at paragraphs 5.6–5.9 justifies exceeding the statutory 10% minimum by reference to Cambridgeshire's comparatively low proportion of land currently managed for nature, rather than by reference to site-typology-specific viability evidence. TCC would welcome confirmation that this evidence has been tested against the particular circumstances of high-density, high land-value science park redevelopment, such as Cambridge Science Park, where on-site biodiversity net gain is inherently

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most difficult to achieve, to ensure the policy meets the Planning Practice Guidance tests that any requirement above the statutory minimum be justified and viable.

Policy BG/PO: Protecting Open Spaces and The Local Plan Policies Map

TCC raises a specific concern under this policy, which it considers should be addressed ahead of Examination and submission.

TCC's previous representations noted that, in earlier iterations of the North East Cambridge evidence base, a significant proportion (approximately a third of the 36ha) of informal open space relied upon to meet the needs of the wider area was identified as being located at Cambridge Science Park (12.37ha) and St John's Innovation Centre (1.46ha). Whilst the housing allocation has largely fallen away from the area, the draft policies map continues to show land on Cambridge Science Park under this designation.

TCC is concerned that the eLP, and in particular Policy BG/PO and its supporting designations on the Policies Map, may continue, whether by omission or by carrying forward earlier assumptions, to rely on existing open space within Cambridge Science Park to meet open space standards or deficits identified for the wider North East Cambridge area, without this being justified by evidence of genuine, secured public accessibility, and without the agreement of TCC as freehold owner.

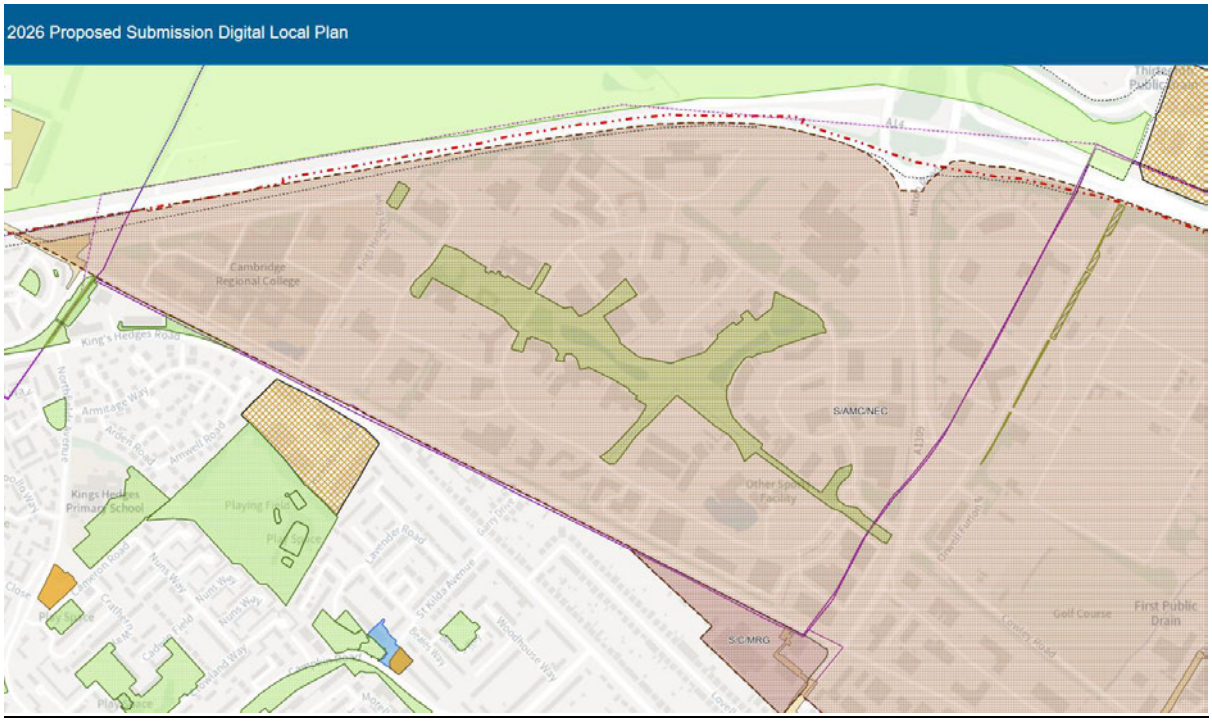
This matters because the future quantum, location, character and public accessibility of open space within Cambridge Science Park is properly a matter for the comprehensive masterplan and associated s.106 obligations currently being progressed through the CSP Outline Planning Application, not a matter that should be predetermined, or assumed as already delivered, through a blanket Local Plan designation prepared in advance of, and inconsistent with, that masterplan.

TCC support the principle of maintaining land for genuinely accessible open space and environmental quality, however the proposals map includes areas that fall outside this, including incidental landscaping outside buildings and an area of land that currently includes the nursery on CSP.



Bright Horizons nursery covered by the BG/PO designation.

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TCC objects to any protection, allocation, or reliance under Policy BG/PO (whether in the policy text, supporting paragraphs, or the Policies Map) which treats existing open space at Cambridge Science Park as meeting public open space standards for the wider North East Cambridge area. This approach is wholly inconsistent with any other employment site within Greater Cambridge. Cambridge Biomedical Campus, Babraham Research Campus, and West Cambridge all include areas of landscaped open space, and none include land protected under BG/PO,

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Absent evidence and agreement, TCC does not consider the Plan can be shown to be Effective in meeting the open space needs of the wider North East Cambridge.

Conclusion

In summary, TCC's outstanding concerns go principally to whether the eLP is Justified (the NEC trip budget and the affordable workspace 'in perpetuity' requirement),and Effective (the interaction between Policy S/AMC/NEC and Policy J/AW, and the treatment of open space at Cambridge Science Park under Policy BG/PO), with the Figure 38 road network point raised as a separate colarification matter.

TCC welcomes the substantial progress made since the 2021 First Proposals and January 2026 Regulation 18 Consultation in recognising Cambridge Science Park's role as Greater Cambridge's largest commercial employment site, and in decoupling the Park's continued intensification from both housing delivery and the relocation of the CWWTP. The majority of TCC's previous concerns have now been resolved.

The points raised above – in particular the evidence trail for the NEC trip budget, the interaction between Policy S/AMC/NEC and Policy J/AW on affordable workspace, and TCC's objection under Policy BG/PO regarding the treatment of open space at Cambridge Science Park – are, in TCC's view, necessary to ensure the Plan is justified, effective, and consistent with national policy, and to avoid conflict with the CSP Outline Planning Application currently being determined in parallel. TCC would welcome the opportunity to discuss these matters further with the Councils ahead of submission, and to participate in relevant hearing sessions at Examination should that prove necessary to resolve any outstanding points.

Yours faithfully

DP9 Ltd

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