

EW/EM/DP7208
30/01/2026

**Greater Cambridge Local Plan
South Cambridgeshire Hall
Cambourne
CB23 6EA**

By Email Only: localplan@greatercambridgeplanning.org

Dear Greater Cambridge Local Plan Team,

**Greater Cambridge Emerging Local Plan (Regulation 18)
Representations in respect of Cambridge Science Park
HELAA Site ID: 115558**

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 Brockton Everlast as a major long leaseholder investor, and in consultation with other long leaseholders in respect of the above address (the 'site'). 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.

For context, DP9 are acting as planning advisors and agents to TCC as part of the current masterplanning work being undertaken on the site, with an application for outline planning permission due to be submitted this year. We welcome the opportunity to make representation on the emerging Local Plan, which will play a key role in shaping the future of the Greater Cambridge area.

Cambridge Science Park is a globally renowned centre of scientific excellence, first founded in 1970 by Trinity College, Cambridge. Cambridge Science Park is the largest commercial employment site within Greater Cambridge by employment floorspace, and home to approximately 250,000 sqm of predominantly research and development employment space, supporting the employment of approximately 8,000 people working in over 150 companies focussed on science and innovation and including but not limited to AI and digital, life sciences, creative and clean energy industries.

Representations were previously made to the 2021 First Proposals Consultation on behalf of TCC and put on record deep concerns relating to Cambridge Science Park's removal as an Employment



Allocation within the emerging Local Plan. The previous consultation did not reference Cambridge Science Park at all.

These representations recognise the alterations made to the draft Local Plan, which now include reference to Cambridge Science Park as a major employment site within the Greater Cambridge Area. However, there are still concerns regarding specific policy wording proposed as set out within these representations.

The draft local plan policies that these representations refer to are:

- Policy S/JH: New Jobs and Homes
- Policy S/DE: Defined Development Extents
- Policy S/NEC: North East Cambridge
- Policy BG/BG: Biodiversity and Geodiversity
- Policy WS/MU: Meanwhile uses during long term redevelopments
- Policy J/NE: New employment development proposals
- Policy WS/IO: Creating inclusive employment and business opportunities through new developments
- Policy J/AW: Available workspace and creative industries
- Policy J/EP: Supporting a range of facilities in employment parks
- Local Plan Policies Map

The evidence base documents that these representations refer to are:

- Draft Greater Cambridge Housing and Employment Land Availability Assessment – Addendum Report (HELAA) (2025)
- Draft Greater Cambridge Local Plan Sustainability Appraisal
- Draft Greater Cambridge Local Plan: Biodiversity and Green Spaces Topic Paper (2025)
- Draft Greater Cambridge Local Plan: Jobs Topic Paper (2025)
- Draft Greater Cambridge Employment and Housing Needs Evidence Update (2025)
- Draft Greater Cambridge Transport Evidence Report (2025)
- North East Cambridge Transport Position Statement (2025)
- Greater Cambridge Skyline and Tall Buildings Strategy (2025)
- Draft North East Cambridge Infrastructure Delivery Plan (2025)

The above policies will each be discussed in turn, alongside confirmation as to whether these representations **SUPPORT**, **OBJECT** or provide **COMMENT** on the policies, or specific parts of the policies and the reasoning behind this.

Policy S/JH: New Jobs and Homes

COMMENT is given to the requirement for development to meet the objectively assessed needs in Greater Cambridge over the period of 2024-2045 with regard to economic development.

These representations are supported by a Technical Note prepared by Volterra which provides the following key considerations:

- A local plan that only meets the minimal “objectively assessed need” could leave no headroom for the extra growth Government and industry partners are actively seeking to stimulate.



- This conservative outlook means the plan could fall short of the Government’s and Combined Authority’s bold ambitions. If Cambridge’s growth even partly approaches the higher national expectations, the currently planned employment land and floorspace would be insufficient to support it.

Policy S/DE: Defined Development Extents

SUPPORT is given to the inclusion of Policy S/DE which seeks to permit development and redevelopment of unallocated land and buildings within defined development extents as defined within the Draft Policies Map for Greater Cambridge 2025.

Cambridge Science Park is located within the defined development extents as illustrated and as a result, should for any reason Policy S/NEC fall away given the uncertainty regarding the CWWTP, the redevelopment of Cambridge Science Park would still principally be supported under Policy S/DE as the site falls within the defined development extent of Cambridge City. This emerging policy broadly aligns with that currently afforded to Cambridge Science Park through Policy E/1 of the Adopted South Cambridge District Council Local Plan (2018).

Policy S/NEC: North East Cambridge

It is noted that Policy S/NEC is drafted to include the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) and that the supporting text references this being “*refined*” prior to the proposed submission stage plan. Given this uncertainty, these representations do not focus on this fundamental change but instead are focused on the impact of this policy as written on the site which forms the largest area within the S/NEC area. The following observations are therefore provided as **COMMENTS**.

The inclusion of Cambridge Science Park as an “*existing innovation hub*” within the vision and identity for North East Cambridge, including reference to “*enabling [them] to evolve to meet future needs*” is welcomed. It is considered extremely important for the policy wording to provide flexibility for the growth of Cambridge Science Park to continue to meet market demands over the coming decades and to ensure it remains a global hub of excellence.

Although the inclusion of Cambridge Science Park within the policy is supported and there is recognition that this policy is subject to change, there are some aspects of the policy wording which could impact delivery of the future of Cambridge Science Park. These are discussed further in turn below.

Uses

The policy frames North East Cambridge as a district rooted in innovation and sustainability, delivered through intensification of commercial and industrial uses alongside new homes, civic space and supporting infrastructure.

The Proposed Development of Cambridge Science Park aligns with this direction by supporting the growth and evolution of an identified key asset, while also bringing a strong place-making offer.



However, Policy S/NEC caps the ambitions by allowing only “up to 320,000 sqm (GIA) of additional business floorspace (Use Class E(g))” by 2045.

It is not clear how the 320,000 sqm additional floorspace cap has been derived. This constraint would limit the scale of future growth at CSP, despite the site’s potential to expand beyond this level.

This is significant in the context of the Employment and Housing Evidence Update 2025 (EHEU 2025), where Icen identifies a need for approximately 600,000 sqm of R&D floorspace and 302,600 sqm of office floorspace across Greater Cambridge.

Capping the development in North East Cambridge risks constraining the ability of the wider area to meet identified employment land requirements. The inclusion of a maximum figure is not consistent with the approach across the emerging Local Plan and should be a **minimum figure** to support economic growth within the wider constraints which are dealt with through the application of other parts of the emerging policy.

Context

It is understood that this section of the Policy will need to be re-written following review of how this area and allocation will progress given the current uncertainty of the CWWTP decision.

Built Form

The Spatial Framework diagram will need to be revised to reflect the CWWTP decision. However, in the interim, the following observations are made to relevant criterion:

- a. Mid- to higher-density development with taller buildings in well-justified locations, primarily around the proposed district centre and fronting Milton Road;*
- b. well-articulated urban skyline that responds to the setting of the city, key views and integrates varied rooflines and silhouettes;*

Broadly, **SUPPORT** is given to reference to mid- to higher-density development with taller buildings in well-justified locations, however with uncertainty regarding the delivery of the proposed district centre, and the wider area, the reference to “*primarily around the district centre and fronting Milton Road*” should be reviewed.

- c. A strong design character that draws on its industrial heritage (such as waterworks and sidings) while embracing architectural innovation;*

Given the 55 year history of Cambridge Science Park in this location, and the likely delivery of development at scale the embracing of architectural innovation is appropriate. However, the context to the west of Milton Road within the S/NEC area (with a 55 year history of scientific innovation and discovery) is quite different to the east of Milton Road (and its industrial heritage).

- e. Proposals must avoid closed ‘campus-style’ layouts and promote openness and inclusivity, providing public access to green spaces, roof terraces, cafes, and community facilities;*

Cambridge Science Park is evolving and a masterplan is being developed with a drive to actively promote wider use of the assets within by the wider community. For example the proposals include a ‘Park of Science’ within the green spaces at the heart of the Science Park open to and for the



enjoyment of both employees on the Science Park and the wider community. In addition Cambridge Science Centre is now located on the Science Park, actively welcoming the wider community into the heart of the site.

However, given the nature of the science undertaken within certain buildings and with specific reference to roof terraces and cafes, the wording in this criteria should include 'as appropriate' rather than a blanket requirement for all roof terraces and cafes to be open to the public.

i. NEC is anchored by Cambridge Science Park, St John's Innovation Park, and Cambridge Business Park, which drive the local and national innovation economy. Commercial development will be delivered through intensification of existing employment parks and mixed-use development around the district centre and local centres, including land adjacent to Cambridge North Station. This level of development will require enhancements to sustainable travel and adherence to the identified trip budgets;

Recognition of the importance of Cambridge Science Park and its role within not just the local but national economy is supported.

It is acknowledged that the principle of adherence to identified trip budgets is consistent with the approach across the emerging Local Plan, however it will be crucial to ensure that the identified trip budget is well evidenced and appropriate. Given the changing nature of this policy, further comment on the proposed trip budget will be reserved until the Regulation 19 consultation, and TCC would welcome the opportunity to work with the LPA to establish an appropriate trip budget for the Science Park.

Nature

Cambridge Science Park is a significantly biodiverse area within Cambridge, with a high value baseline already well-established on the existing site. TCC is investing in the further improvement of the biodiversity value of this land through our proposals. However, this is being balanced with a desire to open up the site to the wider community.

Overall, the inclusion of policy wording in general on the delivery of green and blue infrastructure across North East Cambridge is supported.

However, as currently drafted we cannot support Part 11c of Policy S/NEC: *"meeting 20% Biodiversity Net Gain on-site ..."*

Planning Policy Guidance states that *"plan-makers should not seek a higher percentage than the statutory objective of a 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development"* (Paragraph 006 74-006-20240214).

The Environment Act 2021, the national legislative requirement as set out by Government for BNG is set at 10%, with no aspirational goals included within the Act for this to be increased through the local planning system.

It is considered that the inclusion of 20% BNG within the NEC policy wording has not met the tests required within the PPG outlined above. There is not strong enough or sufficient evidence



to demonstrate the local need for the percentage to be raised to 20% from the statutory objective of 10%, particularly within Cambridge Science Park.

Therefore, the option to deliver BNG through application of the Biodiversity Gain Hierarchy should not be removed through this policy.

As a result, **OBJECTION** is given to the inclusion of 20% BNG on-site requirement within the policy. An aspiration towards 20% is understood, and the ability to deliver this in the most appropriate manner (through on-site and off-site measures) should be in accordance with the BNG hierarchy.

Active Travel and Public Transport First

13c states that development should be within 5 minutes' walk of high quality public transport and active travel routes. This requirement may be unachievable across the entire North East Cambridge area. People are usually willing to walk further than 5 minutes for higher quality services on public transport, which the site provides through the close proximity of the Guided Busway and Cambridge North railway station.

Additionally, the policy does not mention the important role of cycling within the route to public transport as only walking is mentioned.

Vehicle Trip Budget Compliance

The principle of CSP operating within peak hour Vehicular Trip Budgets is understood and should enable growth by facilitating the majority of increased associated movements through other travel modes.

However, the figures provided in the policy are based on an Evidence Base that is dated and relies on assumption relating to existing and forecast development, especially within CSP that are not clearly defined. Therefore vehicular trip budgets should be defined as those associated with the site to enable use of planned and future Park and Ride and Travel Hub facilities that are already and will continue to be part of the Transport Strategy for Cambridge.

Car Parking Strategy

It is noted that Part 25ai of Policy S/NEC requires a maximum of 4,800 spaces for employment parking accessed from Milton Road and 770 spaces accessed from Kings Hedges Road for Cambridge Science Park. This is in addition to a "*no vehicular through route allowed between Milton Road and Kings Hedges Road*".

There is no indication of the numbers to be provided specifically for the Science Park, although the policy suggests a significant reduction in parking at CSP is required.

The submitted Transport specific representations produced by KMC highlight further the issue this poses with both Trinity College and the long leaseholders on the site. TCC therefore **OBJECT** to this section of the policy and suggest that it is reviewed in line with the measures KMC sets out in their work.

Lifespan



Part 31 of Policy S/NEC states “all development must: be brought forward through a comprehensive Outline Planning Application covering the full site”. It is pertinent to raise the potential issues this fundamental requirement could have on developing North East Cambridge. There are, on site, a significant number of leaseholders and landowners (including TCC on the Cambridge Science Park).

Although we consider this not to be the policy authors’ motive, this could be perceived as a single outline application for the entire redevelopment of North East Cambridge ‘must’ be required, which is inevitably and commercially not possible, and therefore TCC **OBJECT** to this element.

To be clear, TCC are committed to submitting an outline planning application for the entire Cambridge Science Park.

It is therefore considered that there should be an amendment to the wording of Part 31, as follows:

- “31. *Comprehensive and coordinated delivery is essential. All development must:*
- a. Be brought forward through a comprehensive Outline Planning Application covering the ~~full~~ development site, supported by:*
 - i. Parameter plans for land use, density, height, movement and green infrastructure*
 - ii. A Strategic Design Code guiding quality, form and materials*
 - iii. A Phasing and Infrastructure Delivery Plan aligned with key triggers*
 - iv. A Stewardship Strategy to ensure long-term maintenance and governance of public realm and facilities*
 - v. Engage meaningfully with local communities and stakeholders through every stage.*
 - vi. Be subject to independent design review, with updates to the Strategic Design Code as phases evolve;”*

Figure 17: Spatial Framework for S/NEC: North East Cambridge

TCC **SUPPORT** the inclusion of a spatial framework for S/NEC: North East Cambridge but wish to **COMMENT** as they consider that Figure 17 should be categorised as “illustrative”.

The inclusion of specified uses within the site (namely the Cambridge Science Park portion) including the link road, active travel connections and roundabout locations is objected to as currently drafted. There are numerous policies within the draft Local Plan that manage and monitor both existing and proposed infrastructure development on the site, and so it is therefore not necessary for the Spatial Framework to dictate the position of these too. This comment reflects back to the requirement for the Spatial Framework to be labelled as illustrative to further highlight this.

It is further considered that the key on the Spatial framework is not simple to understand. The roundabout and link road currently identified on the Cambridge Science Park site does not have a label within the key. Additionally, a roundabout is drawn on the Science Park which is visually similar to the New Guided Busway Stop symbol. Given only one roundabout is shown on the entire framework plan it is suggested that this should not be shown.

There is also a grey outline of a bus on the Cambridge Science Park site which is considered to potentially demonstrate the location of the existing busway stop, but is not shown on the key, or duplicated outside of Cambridge North Station, where another busway stop exists. Clarification on this matter and the key is requested.



Comments relating to the identification and protection of Open Space within the Spatial Framework will be addressed within the below section discussing Policy BG/PO: Protecting Open Spaces. It is considered however that the prescriptive and intricate nature of the area identified within Figure 17 is too detailed and should be removed.

Policy BG/BG: Biodiversity and Geodiversity

Despite TCC supporting the overall objectives of Policy BG/BG which control the biodiversity impacts from development, it considers the wording within the policy to be above what is required by legislation, and therefore **OBJECT** to the policy on that basis.

As mentioned previously, the Environment Act 2021, set a minimum Biodiversity Net Gain of 10% and includes aspirational goals for this to be increased through the local planning system. Additionally, Government PPG states that plan makers should not seek a higher percentage than the statutory objective unless justified through evidenced local need.

Seeking a higher requirement should only be by way of an exception, and in this case, demonstrating that Greater Cambridge is significantly worse than any other part of the country as a whole with regards to the negative impacts on biodiversity seems wholly unrealistic.

It is our view that the 20% requirement set out in Policy BG/BG has not been sufficiently justified based on proportionate evidence and as such should be amended to remove the additional requirement for major development to provide a minimum of 20% and that this should only be referenced as an aspirational target.

Policy BG/PO: Protecting Open Spaces

TCC recognise the importance that open spaces play across Cambridge Science Park. All of the open spaces and biodiverse areas within the Science Park have been planned and curated over its 55 year history.

However, TCC **OBJECT** to the inclusion as currently outlined on the draft policies map.

Firstly, the Greater Cambridge Shared Planning Team have not adopted this approach on any other strategic employment site. Having reviewed Cambridge Biomedical Campus, Granta Park and the Wellcome Campus none of these employment sites contain land designated under policy BG/PO.

The designation's green outline is not logical as shown. It includes car parking areas and development sites.

It is considered that the inclusion of numerous other policies within the draft local plan including Policy BG/BG and written elements within Policy S/NEC cover off the retention and reprovision of open space where necessary. For example, Policy S/NEC requires *“an extensive high-quality network of multi-functional open spaces”*.

Appendix 1 includes an Open Space Assessment of the currently proposed designated open space and demonstrates the inconsistencies within the emerging Local Plan designations across the district.



Should other employment sites also have the application of policy BG/PO then for Cambridge Science Park an amendment to the draft Polices Map to show the areas of Open Space within Cambridge Science Park is suggested.

Policy WS/MU: Meanwhile uses during long term redevelopments

SUPPORT is given to the inclusion of a meanwhile uses policy within the emerging Local Plan. Given the long-term, strategic framework established by Policy S/NEC for whole-site outline applications at North East Cambridge, the ability to accommodate meanwhile uses is considered integral to the deliverability of the allocation. Meanwhile uses can provide flexibility during phased development, activate sites ahead of permanent development, and support the effective implementation of the overall masterplan strategy.

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

The requirement for new developments of 1,000 sqm or more of floorspace within commercial and flexible use classes to submit and implement an Employment and Skills Plan at both the construction and occupation stages is **SUPPORTED**.

The College is a strong advocate for the provision of education, training and skills development opportunities across Cambridge Science Park, including through facilities such as the Cambridge Science Centre and connections with Cambridge Regional College, and local schools. Cambridge Science Park has a strong commitment to inspiring the next generation of innovators.

In supporting this requirement, it is considered important that Employment and Skills Plans are applied in a flexible and proportionate manner, having regard to the nature, scale and phasing of individual developments, as well as the operational requirements of occupiers. An appropriately tailored approach will ensure that Employment and Skills Plans remain effective, deliverable and aligned with existing initiatives across the Science Park, while continuing to provide meaningful benefits to the local community and workforce.

Policy J/AW: Affordable workspace and creative industries

Although **SUPPORT** is given to the overarching objective of promoting the provision of affordable workspace within employment developments, the policy as currently drafted lacks clarity regarding the key requirements for delivery. In particular, the policy does not specify the development thresholds at which affordable workspace would be required, nor does it identify the proportion of floorspace that should be provided as affordable workspace within qualifying schemes.

Should the Council intend for affordable workspace to be delivered as part of larger commercial developments, it is considered necessary for the policy to clearly define both the minimum size of development to which the requirement applies and the percentage of floorspace to be allocated. Alternatively, if the Council does not wish to prescribe specific thresholds or figures, the policy should explicitly confirm that affordable workspace provision will be assessed on a case-by-case basis. This approach should be set out within the policy wording itself, rather than relying on supporting text or supplementary information.



Trinity College Cambridge also supports the inclusion of flexibility to allow affordable workspace requirements to be met off-site in exceptional circumstances. These circumstances may include, but are not limited to, developments where an occupier requires exclusive use of a single office building, or where mixed-use sites comprise multiple landownerships that make on-site provision impractical.

Cambridge Science Park already provides a broad and established range of workspace typologies, supporting businesses at all stages of growth, from early-stage start-ups and incubator space, through grow-on and scale-up accommodation, to bespoke headquarters buildings for established companies. In this context, the ability to meet affordable workspace requirements flexibly across the wider Cambridge Science Park estate, rather than within each individual development parcel, is supported. This would allow affordable workspace provision to be aligned more effectively with the operational needs of occupiers and the evolving lifecycle of businesses, while still contributing to the overall supply of affordable workspace across the site.

Policy J/EP: Supporting a range of facilities in employment parks

SUPPORT is given to the inclusion of support for appropriately scaled facilities in business and employment parks. Cambridge Science Park already benefits from a well-established range of services and facilities distributed across the site, including food and drink outlets, meeting and collaboration spaces, amenities for employees, and landscaped areas that support wellbeing. These facilities are widely used and contribute positively to the day-to-functioning and attractiveness of the Park for both occupiers and visitors.

Furthermore, the emerging masterplan for Cambridge Science Park seeks to build upon this strong existing provision through the introduction of additional services and facilities designed to further support the employment function of the site. These include enhanced indoor and outdoor social and collaboration spaces, leisure and wellbeing facilities, and improved green and public realm spaces. Collectively, these measures will help reinforce Cambridge Science Park as a high-quality, sustainable employment location capable of supporting future growth and development.

Conclusions

These representations provide observations on the level of commercial development within the emerging local plan over the plan period to 2045, in addition to specific comments relating to the draft allocation 'North East Cambridge'. The inclusion of reference to Cambridge Science Park within emerging Local Plan is supported, but comments and objections have been provided where necessary in relation to the individual policy wording, in addition to the information set out within the published evidence base. We trust that these comments will be taken into account when drafting the next version of the emerging local plan.

Yours faithfully,

DP9 Ltd.