

GREATER CAMBRIDGE LOCAL PLAN: REGULATION 18 - PLANNING POLICIES

Bidwells is providing representation to the Regulation 18 (January 2026) Local Plan on behalf of our client, Railpen. This document outlines the policies within the plan where Railpen objects, supports, comments or requests proposed amendments, along with the rationale for each suggested amendment.

Each policy is addressed individually, with an explanation of the rationale for any proposed amendment and, where applicable, suggested revised wording. Where policies are lengthy, it is made clear which specific elements are being commented upon.

Policy S/JH: New Jobs and Homes

On behalf of our client, Railpen, we submit the following representation in response to policy S/JH part 1 (a and b) of the emerging Local Plan policy wording relating to new jobs and homes.

The provision of 73,300 additional jobs across the plan period should be treated as a minimum requirement rather than a maximum or constraining target. The evidence supporting the policy, set out in the *Greater Cambridge Employment and Housing Needs Update 2024–2045 (September 2025)*, concludes at paragraph 3.55 that the range of scenarios modelled indicates a requirement for between 67,600 and 90,900 additional jobs over the plan period. This represents a notable increase compared with the previous 2023 modelling, which identified a range of between 66,600 and 75,800 jobs. The significant uplift at the upper end of the range demonstrates that economic growth expectations have strengthened markedly rather than diminished.

As set out in the Employment and Housing Needs Update, during the strongest phase of recent growth (2010–2020) the Greater Cambridge economy expanded by almost 4,000 jobs per annum. The Update identifies a ‘Central growth’ scenario of 73,200 jobs over the plan period, equating to sustained annual growth of around 3,500 jobs. Importantly, this scenario incorporates assumptions of slower growth phases, periods of contraction, and economic shocks. As such, it is inherently conservative and does not reflect the full growth potential of the Cambridge economy.

Since the preparation of the evidence base, there have been significant changes in the national and strategic planning policy context that further reinforce the need to plan positively for increased job creation and housing delivery. These changes represent a step-change in the policy framework within which the Draft Local Plan must be assessed. On 23 August 2024, Matthew Pennycook reaffirmed the Government’s commitment to Cambridge, stating: *“The economic growth of Cambridge has been a phenomenal success and we should seek to maximise the potential contribution that Greater Cambridge could make to the UK economy.”* He further noted that *“Greater Cambridge has a vital role to play in this Government’s mission to kickstart economic growth.”* In response, the Cambridge Growth Company was established in 2024 to address barriers to growth and help unlock the area’s full economic potential. More recently, in October 2025, the Government announced its intention to consult on the case for a centrally led Development Corporation as a potential delivery mechanism, with statutory consultation planned for 2026.

Greater Cambridge also continues to benefit from strategic infrastructure investment that will further drive demand for employment growth. This includes the proposed East West Rail station, public transport improvements along the Cambourne to Cambridge corridor, and enhancements to the Cambridge Eastern Access corridor. In addition, the *Cambridgeshire and Peterborough Local Growth Plan 2025* identifies priority growth sectors and highlights the need for continued investment in skills development, along with the need for agglomerated growth and multiplier effects.

The Employment and Housing Needs Update explicitly acknowledges ‘High’ and ‘High Sensitivity’ scenarios in which growth can meet or exceeds the 2010–2020 trajectory. At 3.62 of the report it says:

'It is important to acknowledge that the high scenarios could be achieved or exceeded. For this to take place it is considered that a step change in infrastructure investment and development would be needed to facilitate growth, notably in transport to connect in and move labour, as well as in wider services infrastructure and the expansion of both housing and commercial development programmes'.

This is exactly the context Greater Cambridge is in. Never has there been such a focus and commitment to Cambridge from national government. Millions of pounds of investment already taking place and every prospect for much more to come; supported by the Combined Authority and, in short time, a local Development Corporation. The foundations are in place to deliver a high growth scenario set upon a new approach and wave of investment to Greater Cambridge, rather than being led by historic trends within a very different context.

Such levels of growth are demonstrably achievable in Cambridge and align closely with the Government's stated economic objectives. Higher-growth outcomes therefore remain realistic and should not be excluded by policy. This necessitates a revision to the proposed policy wording.

For these reasons, the Local Plan should adopt more optimistic yet realistic assumptions for job growth and provide explicit support for higher-growth scenarios; certainly not to act against them. Without such changes, Policy S/JH is unsound and inconsistent with national policy objectives to support sustainable economic growth and improved productivity.

Policy S/LAC: Other Site Allocations in Cambridge

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan Policy S/LAC wording relating Other Site Allocations in Cambridge. The wording as currently drafted is provided below:

- 1. The following sites identified on the Policies Map are allocated for housing, employment or mixed uses in the Cambridge urban area.*
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- 3. An indicative dwelling or floorspace capacity is identified for each of the site allocations. The number of homes or amount of floorspace granted planning permission on each site may be higher or lower than the indicative capacity and should be determined through a design-led approach.*

In the interests of consistency and precision, reference to Cambridge Retail Park as an allocation should be corrected to be a designation, reflecting the sites inclusion as a designated Public Realm Improvement Area (PRIA). We therefore suggest that the Figure 19 only shows 'allocations' or is made clearer present 'allocations' and separately 'designations' (i.e. PRIAs) so there is no confusion as to how the Local Plan refers to each category.

Policy BG/TC: Improving tree canopy cover and the tree population

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan Policy BG/TC wording relating to improving tree canopy cover and the tree population.

The National Planning Policy Framework (December 2024) requires planning policies to support the protection, enhancement and integration of green infrastructure, including trees. However, it does not prescribe any quantitative tree canopy cover target—such as a 30% requirement—that local planning authorities must apply. Any such requirement within a Local Plan must therefore be fully justified by robust evidence demonstrating that policies are adequate, proportionate and justified, in line with the NPPF's approach to plan-making. There is limited evidence to support the imposition of the suggested policy. Evidence does not suggest that recent development schemes have failed to deliver appropriate levels of tree canopy cover. The imposition of such an impactful policy will introduce a prescriptive constraint that could undermine development capacity, density and viability. As such, it is not aligned with

national planning policy or with the Government's stated ambition for growth. It will have a significant impact on the viability and deliverability of schemes.

The statutory requirement to deliver a minimum of 10% Biodiversity Net Gain (BNG) already provides a robust, outcome-based mechanism for securing ecological enhancement. The BNG framework is evidence-led and capable of responding to site-specific circumstances. The proposed tree canopy cover requirement appears to duplicate, or cut across, the existing BNG regime without sufficient justification, and risks prioritising a single ecological metric over a balanced and holistic planning judgement.

The policy and supporting text state that canopy cover should be calculated using a Council-approved calculator or metric. However, neither the policy itself nor the Biodiversity and Green Spaces Topic Paper identify what calculator or methodology is intended to be used. In the absence of a defined and agreed approach, the policy lacks clarity and certainty.

In the Cambridge context, where sites are often constrained and development viability is already heavily influenced by multiple policy requirements, the introduction of a substantial and fixed canopy cover threshold risks placing an additional and unjustified burden on development.

This will compromise scheme deliverability and, in turn, the ability of the Local Plan to be implemented as intended. Particularly in an authority area which is reliant on large sites to deliver on its stated growth ambitions. The emerging NPPF reform paper (December 2025) seeks to limit the use of quantitative standards in development plans to those specific issues where local variation is clearly justified. A generic tree canopy requirement is precisely the type of rigid, blanket standard that national policy seeks to avoid, as it risks complicating development, constraining design-led solutions and discouraging growth.

Policy BG/EO: Providing and enhancing open space

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan Policy BG/EO relating to the provision and enhancement of open space. The policy wording as currently drafted is set out below:

3. The Councils will require an Accessible Greenspace standard for commercial development, likely to be applied to development in use classes E(g)(i), E(g)(ii), or E(g)(iii) for 100 employees or more (as calculated using the Councils' latest jobs density calculations). The Councils are continuing to explore the number of hectares per employee to apply within this requirement.

The proposed policy approach is insufficiently flexible and fails to adequately reflect the operational, spatial and viability considerations inherent in employment and commercial development in different parts of Greater Cambridge.

The National Planning Policy Framework (2024), including the direction of travel set out in emerging Policy L2 of the reformed NPPF, is clear that planning policies should support economic growth and make effective use of land in sustainable locations. The application of a generic accessible greenspace requirement to commercial development risks constraining efficient site layouts and reducing development capacity, which would be contrary to national policy and the Government's stated ambition to support growth in key sectors, including science and technology. This is particularly significant given the acute shortage of laboratory space identified in the Case for Cambridge 2024. If the government does not address the pressure on infrastructure and the demand for research space, there is a 'real risk' that science clusters will stop growing or relocate to other competitor cities around the world. Imposing a generic greenspace standard on top of existing constraints risks further reducing the capacity of the very sites intended to solve this shortage.

The Government's NPPF reform paper published in December 2025 further reinforces the importance of achieving higher densities in appropriate locations and emphasises the need for flexibility in policy application. In this context, the

proposed open space requirement risks being misaligned with current and emerging national objectives relating to density and efficient land use and could create barriers to delivery in areas intended to accommodate growth.

In addition, the policy acknowledges that the Councils are continuing to explore how the requirement will be calculated. In the absence of a clearly defined and agreed methodology, the policy lacks clarity and certainty. This is likely to result in delays, inconsistent interpretation and avoidable disputes between applicants and decision-makers, with a risk of disproportionate demands being placed on commercial development. Such uncertainty has the potential to adversely affect scheme viability and deliverability, undermining the effectiveness of the policy.

Finally, the emerging NPPF reform paper (December 2025) seeks to limit the use of quantitative standards in development plans to those specific issues where local variation is clearly justified. A generic “hectares per employee” requirement is precisely the type of rigid, blanket standard that national policy seeks to avoid, as it risks complicating development, constraining design-led solutions and discouraging growth.

Policy WS/NC: Meet the needs of new and growing communities

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan Policy WS/NC wording relating to Meeting the needs of new and growing communities. The associated wording as currently drafted is provided below:

4. Proposals for residential sites of 200 or more dwellings (or groups of smaller sites which cumulatively exceed this figure) and employment development of over 5000m² must be informed by detailed assessments of community needs and include strategies that address identified needs. Submitted strategies to meet community needs must demonstrate that the local community and stakeholder groups have been engaged to guide the provision of community facilities to be introduced as part of the site-wide development strategy. Measures may be required to assist the development of a new community, such as through community development workers.

5. All housing development will contribute towards the provision of indoor community facilities to meet the need generated by the development. Developments of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in off-site delivery. Other developments will contribute to off-site provision through planning obligations or through the Community Infrastructure Levy as appropriate. Contributions will be based on a standard of 129m² of such floorspace per 1,000 additional population.

Response to Part 4: Assessment of Community Needs

Policy 4 introduces a requirement for large-scale employment development to be informed by detailed community needs assessments and to include strategies addressing those needs, including evidence of engagement with local communities and stakeholder groups. While the principle of supporting sustainable communities is acknowledged, the policy raises significant concerns in relation to certainty around requirements and maintaining the viability of schemes.

The policy creates uncertainty for the developers by failing to clearly define the content and timing of the required community needs assessments, engagement processes and resulting strategies. It provides no clarity on what level of engagement would be sufficient, how stakeholder views would be balanced, or how engagement outcomes would translate into measurable development requirements. The open-ended reference to additional measures, such as community development workers, further increases uncertainty by introducing potentially ongoing and uncosted obligations. This lack of clarity is inconsistent with the National Planning Policy Framework (December 2024), which requires planning policies to be clear, unambiguous and capable of consistent application, and to provide a predictable framework for decision-making.

The burden of these assessments should fall on the Council as part of their Infrastructure Delivery Plan, and the responsibility should not fall on developers to determine which community needs a development should meet.

Part 5: Obligations

Paragraph 58 of the NPPF requires planning policies to support economic growth and productivity, including by ensuring that planning obligations and policy requirements are not unnecessarily onerous or duplicative.

The proposed policy risks rendering development schemes unviable by imposing a cumulative requirement for the provision of indoor community facilities that is not sufficiently justified or flexible. The application of a fixed floorspace standard of 129m² per 1,000 additional population, regardless of site context and constraints, removes the ability to tailor contributions to site-specific circumstances. In particular, the requirement for on-site provision on developments introduces significant long-term management liabilities, which directly impact a schemes viability. The policy also lacks clarity on the interaction between on-site provision, planning obligations and the Community Infrastructure Levy, creating a risk of cumulative financial burden. This approach conflicts with the Planning Practice Guidance (2019), which requires plan policies to be proportionate, to ensure that the cumulative impact of policy requirements does not undermine deliverability of development and in turn the Local Plan itself. The policy risks placing disproportionate demands on development, thereby threatening the deliverability of commercial premises at the scale envisaged by the Local Plan.

Railpen therefore requests that the policies are removed.

Policy GP/ST: Skyline and tall buildings

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan Policy GP/ST wording relating to Skyline and tall buildings. The wording as currently drafted is provided below:

Firstly, it is considered necessary to define 'tall buildings' within the policy in order to avoid ambiguity. Therefore, the following wording is suggested as a new Point (a):

- a. *Tall Buildings are defined as those which are significantly taller than the surrounding built form.*

With regard to the existing draft wording, it is suggested that point (b) relating to impacts on the historic environment is worded as follows to ensure that it is consistent with the NPPF and allows for future and emerging clusters:

Impact on the historic environment – applicants must demonstrate and quantify the potential harm of proposals to the significance of Cambridge's heritage assets and their settings or other sensitive receptors (view of, backdrop and setting), assessed on a site-by-site basis. These will include impact on key landmarks and viewpoints (identified in Appendix H: Skyline and tall buildings guidance) including from main streets, local vantagepoints (such as bridges) and open spaces as well as, dynamic views from roads and, where applicable, The River Cam corridor. For Cambridge, proposals must ensure that the character and appearance of a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints.

Furthermore, point (c) is suggested to be amended as follows to ensure that the policy remains in line with guidance and good practice by not going above and beyond committed development:

Scale and massing – applicants must demonstrate using scaled drawings, sections, accurate visual representations and models, how their proposals will deliver a high-quality addition to the skyline. This will include assessment of the cumulative impact of committed development at both strategic and local levels with other existing or emerging proposals as well as against the baseline at the time the application is being made.

Lastly, it is considered pertinent to allow for judgement and the planning balance to be applied to point (e) which currently outlines that applicants must demonstrate no impact. The following updates to the wording are suggested to allow for proportionality rather than an absolute requirement for no impact:

Amenity and microclimate – applicants must ~~demonstrate that there is no adverse~~ carefully consider impact on neighbouring buildings and open spaces in terms of the diversion of wind, overlooking or overshadowing, and ~~that there is~~ adequate sunlight and daylight within and around the proposals.

Finally, within all criterion listed for tall buildings, it is considered unsuitable to use the word ‘must’ as this creates a mandatory requirement leaving little to no discretion for decision makers. The use of the word ‘should’ outlines an expectation unless justified otherwise, which aids decision makers in reaching a balanced judgement.

Such changes are required to reflect the intentions of Government to make effective use of land and to increase, as a general intent, the density of developments. A policy that acts to stifle reasonable consideration of height does not accord with the drive for increased density.

Policy J/NE: New employment development proposals

On behalf of our client, Railpen, we object to the emerging Local Plan Policy J/NE relating to new employment development proposals.

Policy J/NE, is overly prescriptive and risks unduly restricting the delivery of large-scale industrial and logistics development serving national and regional needs. In particular, Part 7 imposes disproportionate constraints on warehousing and distribution uses, limiting the Plan’s ability to respond effectively to changing economic and employment requirements. The wording of Part 7 is shown below:

7. Large scale warehousing and distribution centres providing for national or regional needs will not be permitted in Greater Cambridge.

This approach is inconsistent with the direction of travel in the draft reformed NPPF. Paragraph E1 emphasises that plans supporting long-term economic growth should avoid overly prescriptive requirements on acceptable uses and instead enable flexibility to respond to evolving commercial property demands. Paragraph E3 further recognises the particular physical and locational characteristics of freight and logistics development, including the need for access to strategic transport infrastructure and, in some cases, larger buildings. Policy J/NE does not sufficiently reflect this national policy context.

Recent appeal decisions reinforce the importance of flexibility and choice within employment land markets. In the Beehive appeal decision (APP/Q0505/V/25/3360616), the Inspector emphasised that maintaining an adequate and diverse supply of employment land is critical to keeping the market fluid, accelerating delivery, and reducing the risk of investment being lost overseas. The decision makes clear that quantitative targets, including those in the Icen analysis The Greater Cambridge Growth Sectors Study September 2024), should be treated as reference points rather than caps, and that a diversity of site types, locations and offers is essential to meeting demand and maximising job creation.

The policy creates a disproportionate bar for industrial and logistics development, which typically requires larger plots, specific access arrangements and locations beyond tightly constrained settlement boundaries.

The policy therefore risks excluding sustainable employment proposals that would meet identified economic needs and contribute to a diverse and resilient supply of employment land, contrary to national policy and recent appeal findings. It is not effective, as it may prevent appropriate industrial and logistics schemes from coming forward simply because they cannot satisfy the policy requirements, despite being sustainable in principle.

It is requested that Policy J/NE is modified to adopt a more proportionate and flexible approach, explicitly recognising the distinct characteristics of industrial and logistics development. This should allow proposals in rural and edge-of-settlement locations to be assessed on their individual merits where they can demonstrate sustainability, suitable access and appropriately managed impacts. Such an approach would better align the policy with national guidance, the Local Plan evidence base, and the clear findings of recent appeal decisions.

Policy J/AW: Affordable workspace and creative industries

Policy J/AW introduces a new and significant requirement for the provision of affordable workspace within large employment and mixed-use developments. While the principle of supporting a diverse economy is acknowledged, the policy as drafted raises fundamental concerns regarding certainty, viability and consistency with national policy.

Firstly, the requirement for affordable workspace to be made available for occupation at, or prior to, the first occupation of 50 per cent of the non-affordable economic floorspace introduces a delivery risk. This approach would require developers to deliver discounted floorspace early in the development programme, ahead of the point at which sufficient market floorspace has been occupied to support scheme cashflow. Requiring developers to maintain affordable workspace in perpetuity also creates uncertainty for investors that may not know how market conditions will be in the future, deterring investment. For large and complex commercial developments, this front-loading of non-market floorspace has the potential to undermine development viability and delay delivery, contrary to the National Planning Policy Framework (December 2024), which requires plan policies to be supportive of economic growth.

Secondly, the policy lacks essential detail. It does not define the floorspace thresholds, the percentage of affordable workspace to be delivered and the level or duration of rental discounts. These matters are fundamental to assessing development feasibility. Additionally, the term 'affordable' lacks proper definition, affordability might mean different things in different contexts, leading to inconsistencies in how the policy is applied. The absence of this information creates significant uncertainty for applicants and investors, which is inconsistent with the NPPF requirement for planning policies to be clear, unambiguous and supportive of growth (para 16d).

The NPPF is explicit that policies should be underpinned by proportionate, up-to-date evidence (para 32) and that policy requirements should be tested through plan-wide viability assessment. Introducing a policy of this nature before the completion of the required work (para 8.55 of the supporting text) risks embedding requirements that have not been demonstrated to be viable or deliverable.

Finally, the cumulative effect of uncertainty around thresholds, rental levels, delivery timing and management requirements risks placing a disproportionate burden on development at a time when viability is already a limiting factor for schemes due to interest rates, inflation and material costs. Developers may need to make realistic judgments about what can be viably accommodated within Section 106 obligations, which may result in reductions to contributions elsewhere. Paragraph 35 of the NPPF makes clear that the cumulative impact of policy requirements should not undermine the deliverability of the Plan. In its current form, Policy J/AW coupled with other obligations fails to meet this test and risks discouraging investment, delaying delivery and reducing the overall quantum of employment floorspace that can be brought forward. This is particularly worrying as Cambridge is reliant on a small number of large sites, which if not brought forward will mean that development will need to be sought from elsewhere.

For these reasons Railpen objects to the inclusion of Policy J/AW in the emerging local plan.

Policy I/ID: Infrastructure and Delivery

On behalf of our client, Railpen, we submit the following representation in response to the emerging Local Plan policy I/ID wording relating to Infrastructure and Delivery.

The policy is overly rigid in stating that *“planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms.”* This wording implies an absolute requirement on developers to secure all necessary infrastructure provision, irrespective of whether provision is within their control. It fails to recognise that much strategic and utility infrastructure is delivered by statutory undertakers operating under separate regulatory frameworks and investment programmes.

The National Planning Policy Framework (December 2024) is clear that planning policies should be judged to be unsound, if they are not deliverable, are ineffective, and inconsistent with national policy (para 36). Paragraphs relating to plan-making emphasise the importance of collaboration with infrastructure providers and the need for policies to reflect what can reasonably be expected of developers, having regard to the deliverability of the Plan. Requiring developers to demonstrate “suitable arrangements” as a precondition to planning permission, without acknowledging the role, responsibilities and timescales of utility providers, risks placing obligations on applicants that they are not able to control or guarantee.

Furthermore, national policy makes clear that planning obligations and conditions should only be used where they meet the statutory tests of necessary to the development, related to the development and proportional to the scheme. The blanket nature of the policy wording risks going beyond these tests by effectively requiring developers to deliver infrastructure that should properly be addressed through utility providers’ statutory duties and the public sector. This creates uncertainty for applicants, risks delaying otherwise acceptable development, and conflicts with the NPPF’s objective of supporting timely delivery of sustainable development.

The policy should therefore be amended to acknowledge that the delivery of certain infrastructure will be dependent on, and led by, third-party infrastructure providers. Without this clarification, the policy risks being ineffective, undeliverable and inconsistent and therefore fails NPPF tests of soundness by lacking effectiveness, deliverability, and alignment with national policy