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Date: 30/01/2026

Greater Cambridge Shared Planning Services
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

Dear Sir/Madam,

GREATER CAMBRIDGE LOCAL PLAN: REGULATION 18 CONSULTATION RESPONSE

This letter sets out representations in response to the Draft Cambridge Local Plan (Regulation 18) ('Local Plan'), prepared by Bidwells LLP on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd, who in turn represent the Chesterton Partnership.

The representations have been prepared in respect of allocations for North East Cambridge and Station Road West which are identified in the emerging local plan under Policy S/NEC and Policy S/C/SRW respectively. These representations broadly support the draft policies, subject to some proposed amendments to the policy wording and supporting Spatial Framework.

In addition to the aforementioned site allocations, commentary has also been provided in respect of a number of development management policies.

Representations - Draft Greater Cambridge Local Plan – Site Allocations

Policy S/NEC: North East Cambridge

Overall, Policy S/NEC and the policy direction is **supported**.

As outlined in previous representations, Brookgate Land Ltd is the development partner of Network Rail and D B Cargo UK who own Land at Cambridge North, formerly known as the Chesterton Sidings, and who collectively form The Chesterton Partnership. Brookgate Land Limited has been working as promoter for The Chesterton Partnership in order to secure the rationalisation and redevelopment of the former Chesterton Sidings site.

For clarity, the Chesterton Sidings site forms part of the wider North East Cambridge allocation adjacent to Cambridge North Station, with site ownership boundaries included in Appendix 1 for information.

Brookgate Land Ltd and Network Rail Infrastructure Ltd consider that North East Cambridge remains one of the largest brownfield sites in Cambridge, located in a highly-sustainable location and served by excellent public transport infrastructure. It therefore continues to present a significant opportunity to



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transform the area into a high-quality gateway to the city and act as a catalyst for the regeneration of the wider area, following delivery of the station in 2017.

The vision for a mixed-use commercial and residential quarter that supports growth in office, laboratory and R&D space, while also delivering new homes, particularly within the private rented sector, to meet the needs of Greater Cambridge's growing workforce, is therefore **supported**. Proposals within North East Cambridge should therefore make optimal and efficient use of the site, to deliver a transformative new district that builds on its legacy of innovation.

Since the Greater Cambridge Local Plan – First Proposals Consultation in 2021, hybrid planning permission on the area known as Chesterton Sidings has been approved (LPA Ref. 22/02771/OUT), in addition to the existing 217 bed hotel (LPA ref. S/2372/17/FL) and a 90,000 sq.ft office (LPA ref. S/4478/17/FL) which have now been completed. Due to the changing planning context, Brookgate Land Ltd and Network Rail Infrastructure Ltd wish to ensure that the draft allocation accurately reflects the extant planning permission.

Generally, it must also be considered that the draft allocation focusses on the opportunity provided by the relocation of the existing Cambridge Waste Water Treatment Plant ('CWWTP'). Despite the Government's announcement in 2025 confirming withdrawal of funding for the relocation of the CWWTP, the policy remains largely silent on this scenario. It is therefore considered that the policy should provide sufficient flexibility to ensure that retaining the CWWTP does not prejudice the delivery of the remaining parcels and planning applications are considered on their individual merits.

With the above in mind, the following clarifications and/or amendments are requested.

Uses

Draft Policy S/NEC is worded with an appropriate degree of flexibility to support the delivery of a significant mixed-use development. In particular, the use of the term '*approximately*' provides necessary flexibility in respect of the quantum of homes to be delivered, reflecting the scale, complexity and long-term nature of the regeneration of North East Cambridge.

Notwithstanding this, North East Cambridge represents a highly sustainable location, with excellent public transport accessibility and proximity to employment, services and infrastructure. It is in these locations that Housing Secretary Steve Reed outlined that there would be a 'default yes' to housing proposals within the Written Ministerial Statement published on November 18 2025. As such, North East Cambridge is particularly well suited to a range of residential tenures and typologies, including Build to Rent and co-living.

It is therefore requested that Draft Policy S/NEC includes explicit reference to the acceptability of Build to Rent and co-living, subject to compliance with other relevant policy requirements. To support delivery, it is also suggested that the quantum of Build to Rent and Co-living tenures not be specified but rather be market-led. This would ensure the policy remains responsive to evolving housing needs and market conditions over the lifetime of the plan.

Brookgate Land Ltd and Network Rail Infrastructure Ltd do not support the inclusion of specified quantum of floorspace within the draft policy. Based on experience of delivery at North East Cambridge, there has been a historic underestimation of employment densities in and around the station and the currently proposed 320,000 sqm of employment floorspace does not achieve sufficient density for adequate place making. Additionally, a limit on floorspace does not recognise the advances in technology and will in turn hinder the growth of employment in Cambridge. Rather than provide a specified quantum, the policy should be worded to recognise that employment floorspace should be led by market demand above all.

Furthermore, point 3(b) sets a maximum quantum of business floorspace, defined within the policy as Class E(g) uses. However, point 3(c) identifies an additional quantum of floorspace for mid-tech, light industrial and creative industries, which we understand would also fall within Class E(g)(iii). As a result, a number of future consented uses are likely to fall within the scope of both points (b) and (c).

To avoid the potential double counting of proposed uses, it is recommended that the restriction to Class E(g) uses be removed from point 3(b). The provision of business or employment floorspace should instead defer to the definition of employment floorspace set out in draft Policy J/NE¹.

Furthermore, the removal of specified use classes follows draft NPPF Policy E1. Limb 2 of the emerging policy recognises that commercial property markets can change rapidly, and as a result, plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific).

In terms of the Site itself, it does not have any spatial qualities or constraints that mean it must be restricted to E(g)(i), (ii) or (iii) uses only. Rather, it has qualities that mean it should be considered for a wider range of uses

Whilst the NPPF consultation document carries limited weight and is subject to change, it does set a clear direction of travel for national policy, particularly a clear set of rules for plan-making.

The need to consider this draft NPPF for plan-making purposes is reaffirmed by the Secretary of State in his letter to Local Authority Leaders and Metro Mayors² in December 2025, however, we acknowledge the Council's intention to prepare this Plan under the old plan-making system and therefore the December 2024 NPPF.

Public Space

Point 8 of Policy S/NEC requires hubs and centres to be car-free. This requirement is fundamentally incompatible with the functional and operational needs of the commercial uses that such centres provide, many of which rely on vehicular access for deliveries and the provision of car parking to remain viable. As a result, the creation of genuinely car-free areas in and around hubs and centres is not achievable in practice.

The Local Centre identified on the spatial framework document (addressed in more detail on page 5) is shown to be located on the main vehicle connection to Cambridge North Station and the guided busway. Therefore, the policy requirement for this area to be car-free is once again incompatible with the planning permission and wider vision for the Site allocation.

The draft policy therefore imposes an unrealistic requirement that risks undermining the deliverability of these centres. It is accordingly requested that the requirement for car-free zones in proximity to hubs and centres is removed from Policy S/NEC.

Movement

¹ a. E(g) i. Offices ii. R&D facilities iii. Light industry, b. B2: General Industry, c. B8: Storage and distribution. Any sui generis uses that share a significant number of characteristics with the uses above, in particular sui generis medical research institute uses.

² Secretary of State Letter to Council Leaders 16 December 2025: [Letter from the Secretary of State to local authority leaders and metro mayors: Next phase of reforms to accelerate growth and housebuilding](#)

At point 14 of policy S/NEC, it is stated that cycle parking must exceed minimum standards. Brookgate Land Ltd and Network Rail Infrastructure Ltd do not feel that it is reasonable to enforce exceedance of the adopted minimum standards. The requirement for strict cycle parking standards is seen as limiting the density of developments with knock-on consequences for viability.

It is therefore suggested that the policy is worded to state that *'cycle parking should, where feasible, meet minimum standards'*

The removal of the mandatory *'must'* and replacement with the phrase *'should, where feasible'* outlines an expectation unless justified otherwise, which aids decision makers in reaching a balanced judgement. This additional flexibility will allow greater choice in how cycle storage is provided, helping to avoid costly requirements such as additional basement levels or the loss of housing units.

At point 22, it is also noted that the draft policy states that proposals must align with the North East Cambridge High Level Transport Strategy (2021) which sets out trip budgets for individual development sites. It is noted that the Site Allocation Topic Paper (2025) references a North East Cambridge Transport Position Statement from 2025. From a review of the 2025 strategy, it was found to provide a more up to date position regarding the trip budgets and takes into account the approved hybrid planning permission for Chesterton Sidings. For this reason, it is important that the most up to date document should be referenced in the policy.

Point 25 of the draft policy sets out the car parking strategy for the allocation. The requirements make no reference to the approved hybrid planning application at the Site, which secured car parking spaces for the commercial elements at Chesterton Sidings. Instead, the policy only references a quantum of parking for employment uses at Milton Road. It is therefore requested that the following is included at Point 25 to reflect the planning permission:

- *Approximately 650 spaces (Chesterton Sidings)*

Additionally, it is noted that there is a presumption in favour of car-free development but it is considered pertinent to ensure that the policy accounts for the Network Rail car parking spaces which have been retained under the hybrid permission as part of the franchise agreement. It is therefore requested that under *'Ancillary Uses'* of point 25, the following is added:

- *Parking for Network Rail is re-provided as a minimum of 425, with capacity for additional provision as requested.*

It is also requested that the requirement for 100% EV charging is removed from the allocation with regard to residential parking. This requirement will be enforced within Part S of the Building Regulations 2010 (as amended). As per the NPPF 2025 draft policy PM13 (Setting Standards) and the now withdrawn PPG 1, planning policies should not replicate matters already addressed by Building Regulations.

Finally, at point 27 of Policy S/NEC it states *'parking displacement within 2km will be monitored and development will be paused until mitigation is implemented'*. This is deemed to be unnecessarily punitive. Potential impacts on car parking should not, in themselves, justify pausing development, especially where the proposal delivers significant public benefits. It is therefore requested that *development will be paused until mitigation is implemented* be removed from point 27.

Lifespan

Point 31 stipulates that any future planning applications for the wider allocation must be submitted as an Outline planning application. This requirement is unnecessarily restrictive. There is clear evidence of a hybrid planning application for the Chesterton Sidings site being successfully approved, demonstrating

that alternative application routes can be both appropriate and effective for complex sites. Mandating a specific form of application removes flexibility, risks delaying the planning process, and may increase the time to first completions of much needed housing. This, in turn, could unduly impact scheme viability and the timely delivery of development, contrary to the objective of boosting housing supply.

Furthermore, point 31 of S/NEC requires a number of complex and unnecessary documents to accompany any future submission within policy area S/NEC.

A design code was not submitted in support of the outline elements for the Chesterton Siding site, yet the approved scheme is considered to constitute high-quality and cohesive design. It is therefore requested that this is removed from the policy and should a design code be required, this be conditioned rather than being required up-front.

Furthermore, the requirement for a Stewardship Strategy is not considered proportionate to the scale and form of developments that are likely to come forward. The wider allocation comprises a number of smaller sites rather than requiring a comprehensive application for the entire site. Stewardship Strategies such as those used at Poundbury in Dorset rely on unified land ownership and long-term estate control, meaning that this approach would be difficult to implement on an allocation comprising multiple independent landowners. The effectiveness of a stewardship strategy depends on consistent design standards, a single management structure, and clear funding mechanisms secured in perpetuity. The additional complexity, cost, and governance requirements are therefore disproportionate to the scale or nature of the allocation. If required, individual conditions can be imposed on planning permission for a Stewardship Strategy rather than be required upfront.

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

Figure 17 is largely consistent with the approved hybrid planning permission for the area comprising Chesterton Sidings. However, it should be made clear that figure 17 is intended as an illustrative masterplan and is not a prescriptive tool.

Furthermore, it is noted that a heritage asset is identified within the Chesterton Siding site. There are no heritage assets on Site and therefore it is requested that this is removed from the spatial framework in this location.

Additionally, it is noted that a new local centre is identified within the Chesterton Siding site. Despite there being a small, approved quantum of retail, cafe and food/beverage floorspace at ground floor level of the approved buildings in this location, it is not deemed that the circa 650 sqm quantum would be enough to be considered a 'Local Centre' in the retail hierarchy. This would place unnecessary restrictions on the use of this floorspace should it be considered that Town Centre uses were not viable in future.

Additionally, it must be noted that the proposed new local centre is not identified under draft Policy J/RC (Retail and other complementary town centre uses) as an emerging Local Centre. Should the new Local Centre at Chesterton Sidings not have been designated for retail planning purposes, this should be made clear within the policy so as to not place undue constraints on uses in this area in future.

S/C/SRW: Station Road West

There is overall **support** for the continued allocation of Station Road West as the final undeveloped parcel of the wider CB1 development. The area is known as the Devonshire Quarter and comprises land both within Brookgate Land Ltd and Network Rail Infrastructure Ltd and Network Rail ownership, with the latter comprising the existing car park.

It is noted that planning permission granted on the Site (LPA Ref. 21/00264/FUL and 18/1678/FUL) has now lapsed, however, in line with the commentary provided on the allocation within Site Allocations Topic Paper (2025), it is pertinent to consider this within the draft allocation.

Uses

Firstly, while it is acknowledged that the previous planning permission would have delivered up to 11,300 sqm of Class E (g)(i) and (ii) floorspace, this should not be relied upon as a fixed benchmark, as it would unduly constrain flexibility and would not respond appropriately to changing economic, market or site-specific circumstances over the plan period.

It is therefore considered inappropriate for the Local Plan to specify a fixed quantum of Class E (g)(i) and (ii) floorspace. Instead, the amount of development should be determined through a context-led approach, informed by site characteristics, surrounding uses, accessibility, design considerations and compliance with the rest of the allocation. This would allow future proposals to respond positively to evolving needs while still ensuring high-quality, sustainable development.

It is noted that the land-uses within the allocation fail to acknowledge that a hotel use has previously been accepted in principle on the Site, as evidenced by the grant of planning permission under LPA Ref. 18/1678/FUL. This demonstrates that the Site has previously been considered suitable for town-centre use.

Furthermore, the Site occupies a highly sustainable location for residential development including Build to Rent and Co-living, being situated within an 200 metres walking distance of Cambridge Station and benefitting from excellent access to public transport, employment opportunities, and local services. Having regard to the future direction of national planning policy, as set out in the draft 2025 NPPF consultation, there is a clear and strengthened presumption in favour of residential development in such sustainable, well-connected locations.

To provide flexibility and better reflect the Site's potential, it is therefore proposed that the land-uses are not narrowly specified, but instead the site is allocated for '*mixed-use development*'. For the avoidance of doubt, mixed-use can include a mixture of uses within Class E.

Height and Massing

Brookgate Land Ltd and Network Rail Infrastructure Ltd consider that the allocation contains conflicting requirements in relation to height and massing.

Point (a) indicates that massing should be context-led, suggesting flexibility to respond to the surrounding environment, whereas point (b) prescribes that building height should be less than, or similar to, contemporary development to the west of the station. This creates tension between a flexible, context-driven approach and a rigid height limitation, potentially restricting the ability to respond appropriately to the site's specific characteristics. It is therefore requested that prescriptions of building heights at point (b) are removed from the allocation. Point (a) however, is supported and should be retained as a positive, context-led approach would allow for appropriate flexibility in an area of the City whereby height is greatly affected by viability.

Point (b) also states that new development should not 'negatively impact' Strategic Viewpoint E from Limekiln Road. It is considered that the term 'negatively impact' is highly subjective and open to varying interpretation, with limited clarity regarding which elements of the skyline are indeed considered to positively contribute at present.

To provide certainty for applicants and decision-makers, it is recommended that the policy is reworded so that proposals are required to ‘have regard to Strategic Viewpoint E’, rather than relying on a subjective standard of negative impact. This approach would support high-quality development that respects the strategic view while allowing for proportionate interpretation.

Redline Boundary

Furthermore, it must be noted that the inclusion of the railway tracks within the allocation reflects land-ownership boundaries but does not reflect the correct developable area. It is therefore requested that the redline of the allocation is amended to reflect the plan shown below.

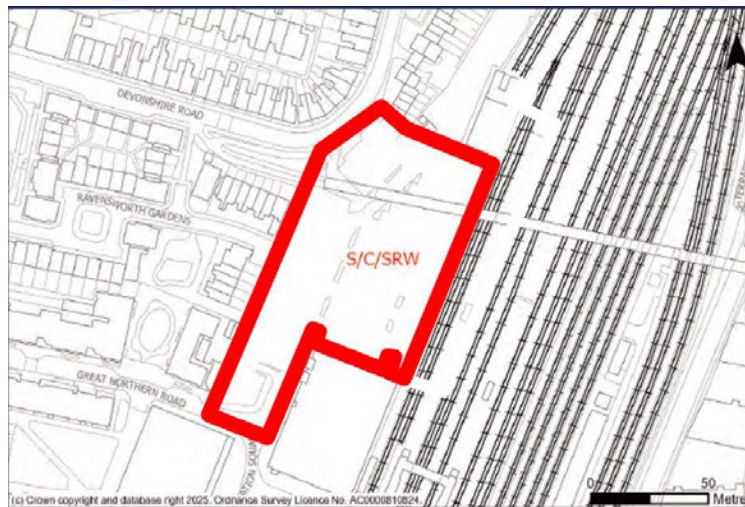


Figure 1. Proposed Amendment to Site Location Plan for Station Road West

Representations on the Draft Greater Cambridge Local Plan – Development Management Policies

Policy S/JH: New Jobs and Homes

The proposed wording implies that the job figure included in Policy S/JH represents an objectively assessed need. However, this figure should be regarded as a minimum benchmark, not a maximum or constraining target.

Supporting evidence to the policy titled the ‘Greater Cambridge Employment and Housing Needs Update 2024-2045 (September 2025)^[1], concludes at 3.55 that the various scenarios modelled indicate a need of between 67,600 and 90,900 additional jobs over the plan period. This compares to between 66,600 and 75,800 additional jobs modelled under the previous 2023 results. This significant increase in the upper end of the modelling indicates that economic growth expectations have strengthened exponentially, not diminished.

As set out in the Employment and Housing Needs Update, during the strongest phase of growth (2010–2020), the Greater Cambridge economy expanded by almost 4,000 jobs per year. The evidence identifies

^[1] This is referred to in the draft GCLP as the Greater Cambridge Employment and Housing Evidence Update 2025 (EHEU 2025). We assume this an error.

a ‘Central growth’ scenario of 73,200 jobs across the plan period, representing sustained annual growth of around 3,500 jobs.

The advancements are not just in the scientific arena. Life science research and application has seen a technological transformation over recent years. The majority (83%) of the life sciences community is now using some level of automation across their R&D processes (Bidwells & YouGov, 2023). This has innovated the drug development process and clinical trials, but is extending well beyond these areas. Cloud-connected medical devices, artificial intelligence, machine learning, and gene sequencing and editing are evolving rapidly and will deliver new products and transform processes. This will present challenges to companies across the sector to keep pace with the evolution underway. Restricting employment growth to historical trends fails to embrace the advancement technology brings. Over the lifetime of a plan restricting employment floorspace in one of the most innovative clusters in the world fails to meet one of the Government’s key priorities of growing the economy

Crucially, the Central growth scenario builds in assumptions of slower periods, contractions, and economic shocks, and is therefore inherently conservative rather than reflective of the full growth capacity of the Cambridge economy.

However recent Government announcements highlight the Government’s continued commitment to growth in Cambridge. This has been further strengthened through the direction of travel set out in the proposed reforms to the NPPF (Draft, 2025). Policy E2 states: ‘substantial weight should be given by the decision-maker to the economic benefits of proposals for commercial development’.

The Employment and Housing Needs Update acknowledges a ‘High’ and ‘High Sensitivity’ scenario, whereby growth would meet or exceed the 2010–2020 trajectory. This high level of growth is feasible in Cambridge and would support the Government’s direction of travel. It is therefore important to recognise that higher-growth outcomes remain credible and should not be ruled out by policy. This requires revision to the proposed policy wording.

For these reasons, the Local Plan should consider utilising a more optimistic and realistic figure for job numbers and include explicit support for higher-growth scenarios, with corresponding flexibility in employment land allocations. Without these changes, Policy S/JH risks being unsound and inconsistent with national policy objectives to support sustainable economic growth and productivity.

Policy CC/DC: Designing for a changing climate

Brookgate Land Ltd and Network Rail Infrastructure Ltd **support** Policy CC/DC which sets clear, designed criteria to ensure high-quality, sustainable and inclusive places in order to respond to the climate crisis. This aligns with Brookgate Land Ltd and Network Rail Infrastructure Ltd’s vision for Cambridge North and Station Road West, which both will be led by these guiding principles.

However, Brookgate Land Ltd and Network Rail Infrastructure Ltd wish to seek clarification on a number of points within the policy to ensure it is flexible and achievable for future developments.

At point 2 it is noted that ‘*Development proposals should reflect the cooling hierarchy*’. It is not considered that the cooling hierarchy would be appropriate for all forms of development and imposition of the cooling hierarchy for minor scale developments would be disproportionate, placing unnecessary burden on applicants. It is therefore requested that the policy is worded to ensure that the cooling hierarchy will apply to major developments only.

Point 3 of the policy states that *‘All new dwellings shall be designed to benefit from cross ventilation where possible.’* While the inclusion of the phrase *‘where possible’* is welcomed and introduces an appropriate degree of flexibility, the supporting text goes on to state that *‘single aspect dwellings should be avoided for all schemes as effective passive ventilation can be difficult or impossible to achieve.’*

This supporting text is overly restrictive and the rigid application of dual-aspect requirements can reduce significantly the number of homes capable of being built within developments, limit density or lead to an undesirable trade-off with habitable space. The policy also does not sufficiently recognise site-specific constraints that may make cross-ventilation or dual-aspect layouts inappropriate or unachievable. In particular, the following circumstances may impact delivery of dual aspect units:

- proximity to railway lines or major roads, where openings may exacerbate noise or air quality impacts;
- heritage assets or conservation areas; and,
- constrained urban sites.

All of the above may reasonably necessitate single-aspect dwellings as part of a well-considered design solution. It is therefore requested that the policy and supporting text more clearly acknowledge that the appropriateness of cross ventilation and single-aspect dwellings should be assessed on a case-by-case basis, informed by site-specific constraints and design-led discussions, rather than applying a blanket presumption against single-aspect dwellings.

Policy CC/NZ: Net Zero Carbon New Buildings

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to policy CC/NZ. The policy goes above and beyond existing sustainability benchmarks without consideration for impacts on viability and deliverability. Whilst Brookgate Land Ltd and Network Rail Infrastructure Ltd welcome the ambition to ensure that all buildings help to meet zero-carbon targets, there needs to be greater flexibility within the policy wording.

Firstly, requiring net zero operational emissions at the shell and core stage is not appropriate where the future end user and operational profile are not yet known. Such a requirement risks imposing impractical obligations and may deter occupier delivery or investment.

With regard to Part A, all new dwellings and non-domestic buildings are expected to achieve a space heating demand of 15-20 kWh per meter squared per year. This figure is in line with Climate Change Committee, LETI Net Zero definition and Passivhaus standard, which are higher than other national standards and therefore placing unrealistic expectations on developers.

With regard to Part B, the EUI targets are split between uses. For residential dwellings, the targets are set at 35 kWh per meter squared per year which is aligned with LETI Net Zero definition and the National Grid Future Energy Scenarios. The policy once again goes above and beyond national standards.

It is also understood that the Building Regulations Part L 2025 update/Future Homes Standard is due to include specific EUI targets once published. As EUI targets will be published in this legislation, it is suggested they are removed to ensure that the draft policy complies with NPPF 2025 draft policy PM13 (Setting Standards) and the now withdrawn PPG 1, which states that planning policies should not replicate matters already addressed by Building Regulations.

Furthermore, the table below compares the 2025 and 2040 EUI targets set out in the UK Net Zero Carbon Buildings Standard and demonstrates that the EUI requirements exceed existing targets, with no flexibility to allow dwellings to benefit from a transitional period ahead of 2040.

USE	DRAFT LOCAL PLAN	2025 TARGET EUI	2040 TARGET EUI
Dwellings (Flats)	35 kWh/sqm/year	40 kWh/sqm/year	35 kWh/sqm/year
Dwellings	35 kWh/sqm/year	45 kWh/sqm/year	35 kWh/sqm/year

Table 1. EUI Targets in UKNZCBS versus draft local plan.

Finally, it is also noted that all other uses include a requirement to meet the UK Net Zero Carbon Buildings Standard 2030 targets. The pilot study published in 2025³ did not include any information on EUI targets noting that these would be added once sufficient data is collected. We are therefore unable to comment on these targets without clarity on what they may be.

Policy CC/WE: Water Efficiency in new developments

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to the proposed wording of Policy CC/WE.

The policy goes beyond national and industry guidance by effectively mandating rainwater or greywater harvesting on all major developments, which will not always be appropriate or deliverable. This is particularly the case for commercial led development, where such systems may conflict with operational requirements, site constraints, or viability. National policy promotes proportionate, context-led approaches to water efficiency.

Brookgate Land Ltd and Network Rail Infrastructure Ltd also query the use of the word ‘must’ within the policy 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.

With regard to potable water, the policy applies a stricter internal water-use requirement to developments of over 100 dwellings. While the aim of reducing water consumption is supported, it is unclear why development size alone justifies a higher standard. Internal water use is largely determined by occupant behaviour and individual dwelling specifications, rather than the overall scale of a development. Residents cannot reasonably be expected to use less water simply because they live in a larger scheme. As drafted, the policy risks being arbitrary and may fail the tests of justification and effectiveness. It should either apply a consistent, evidence-based standard across all residential development or provide clear evidence explaining why a higher requirement is appropriate only for larger schemes.

Furthermore, the policy requires commercial units to achieve all five BREEAM water credits (WAT 01–05), with flexibility applied only to WAT 01. In practice, achieving all BREEAM credits is often challenging and may not be feasible in all circumstances. It is also noted that the remainder of the draft Plan is largely silent on BREEAM. As drafted, the policy would therefore require all commercial developments engage with a qualified BREEAM assessor to demonstrate the credits have been achieved, irrespective of scale or complexity, resulting in additional cost. This raises concerns regarding proportionality, particularly for smaller or less complex commercial schemes.

³UK Net Zero Carbon Buildings Standard Pilot Version Rev 2 (April 2025)
[6ea7ba_1ef36b6835de46668f2ad8b589ff1b93.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/106486/6ea7ba_1ef36b6835de46668f2ad8b589ff1b93.pdf)

Finally, at point 5 the draft policy requires all new dwellings with private outdoor amenity space to provide a water butt for rainwater collection or irrigation. It is requested that the policy is worded to allow for sufficient flexibility in the provision of rainwater collection in private amenity spaces. The policy should have due consideration for where other forms of water collection are proposed on Site and recognition that rainwater harvesting may impact usability of the private amenity spaces or may be entirely impractical to deliver.

Policy CC/CE: Supporting a circular economy and sustainable resource use

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to the proposed wording of policy CC/CE.

While Brookgate Land Ltd and Network Rail Infrastructure Ltd support the policy's objectives and the promotion of circular economy principles, these are already embedded within Brookgate Land Ltd and Network Rail Infrastructure Ltd's standard development approach, with embodied carbon routinely assessed through scheme design and delivery.

Further clarity is also requested on the policy wording. The policy states that proposals involving the demolition of a building, in whole or a significant part, should be accompanied by a full justification. Clarification is needed on what constitutes 'a significant part' to avoid ambiguity.

While the emphasis on retrofit is supported, the policy does not appear to allow for other material benefits that may outweigh the presumption in favour of repairing, refurbishing, and re-using. It is recommended that the policy acknowledges that, in certain circumstances, demolition may be acceptable where justified by wider planning benefits.

Flexibility should be added to the policy to make it clear that if the viability and deliverability of refurbishment, retrofit or reuse places considerable doubt, then demolition and redevelopment is the only realistic option for the Site.

Policy BG/BG: Biodiversity and geodiversity

The proposed requirement to uplift the mandatory minimum to 20% BNG for major development is considered unsound, as it is not adequately justified and is inconsistent with national policy. The uplift is not supported by a robust evidence base and does not sufficiently demonstrate that it is proportionate or deliverable across all sites.

The national BNG framework provides clarity and certainty for plan-making and decision-taking. Any local requirement exceeding the statutory minimum must therefore be clearly justified, flexible, and grounded in site-specific ecological capacity and viability.

Policy BG/BG risks undermining policy certainty by imposing a fixed uplift beyond the national framework without adequate justification. Any BNG delivered above the mandatory 10% requirement should be treated as a material benefit in the planning balance, rather than a fixed policy requirement.

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

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

Chapter 11 of the National Planning Policy Framework (2024) is clear that planning policies should promote the effective use of land in meeting the need for homes and other uses, particularly in sustainable locations. The need for making an effective use of land is further strengthened through the direction of travel set out in L2 of the draft NPPF, supporting densification.

The requirement for major development to demonstrate a minimum of 30% tree canopy cover on site risks introducing an inflexible and 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.

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 identifies 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 fixed canopy cover threshold risks placing an additional and unjustified burden on development. This could compromise scheme deliverability and, in turn, the ability of the Local Plan to be implemented as intended.

Policy WS/NC: Meeting the needs of new and growing Communities

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to policy WS/NC as currently drafted. The policy is ambiguously worded, creating uncertainty that may impose an additional and unwarranted burden on development.

Specifically, point 4 states that proposals for residential developments of 200 or more dwellings (or multiple smaller sites that cumulatively exceed this threshold), as well as employment developments over 5,000 m², must be informed by detailed assessments of community needs and include strategies to address those needs. It is understood that these assessments should be prepared by 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.

Policy WS/CH: Cultural and creative hubs

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to this policy as currently worded.

The policy wording is overly broad and lacks sufficient clarity, contrary to the requirements of the NPPF for policies to be clear and effective. In particular, the policy fails to define what constitutes a 'cultural and creative hub', providing no indication of expected quantum, floorspace thresholds, or relevant use classes.

The reliance on imprecise terminology, such as 'a mix of cultural activities' does not establish any meaningful or measurable criteria against which proposals can be assessed. As a result, the policy introduces a significant degree of uncertainty for both applicants and decision-makers, creating scope for inconsistent interpretation and application.

Policy BG/EO: Providing and enhancing open spaces

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to the proposed wording of Policy BG/EO.

The policy introduces a requirement for open space associated with commercial developments without clarity on the quantum required. The policy is insufficiently flexible and does not reflect the operational and spatial requirements of employment and commercial development.

The National Planning Policy Framework (2024), including the direction of travel set out in Policy L2 of the draft NPPF, is clear that planning policies should support economic growth and make effective use of land in sustainable locations. Applying a generic open space expectation to commercial development risks constraining efficient site layouts and reducing development capacity, contrary to national policy and the Government's stated ambition to support growth in the commercial sectors, as set out in Policies E1–E3 of the draft NPPF.

Policy BG/EO should therefore be reconsidered to allow open space provision to be assessed on a case-by-case basis, adopting a flexible and proportionate approach that recognises the functional requirements of employment uses and aligns with national policy on effective land use, economic growth and plan deliverability.

Policy GP/ST: Skyline and tall buildings

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to the proposed wording of Policy GP/ST.

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 **Cambridges 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.

Policy GP/HE: Historic Environment

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to policy GP/HE as worded.

Part 2(b) is overly prescriptive and not fully consistent with national policy or the statutory framework for decision-making in the historic environment. The use of the word ‘must’ risks precluding high-quality, sustainable development by implying an absolute requirement to conserve or enhance heritage assets in all circumstances, rather than allowing for a balanced planning judgement.

National policy and legislation require decision-makers to have special regard to the desirability of preserving heritage assets, while weighing this against the scale of harm, site context and public benefits.

Policy GP/HE should therefore be amended to adopt more proportionate wording that reflects this balanced approach, consistent with the NPPF 2024 and statutory duties.

Policy GP/HA: Designated heritage assets

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to policy GP/HA as worded. The proposed policy wording does not allow for any harm to designated heritage assets and fails to recognise the balancing exercise required by both the National Planning Policy Framework (2024) and the Planning (Listed Buildings and Conservation Areas) Act 1990.

The statutory duties under Sections 66 and 72 of the 1990 Act require decision-makers to have special regard to the desirability of preserving the setting of listed buildings and special attention to preserving or enhancing the character or appearance of conservation areas. These duties do not impose an absolute prohibition on harm, but instead require any harm to be identified and weighed in the planning balance.

Similarly, the NPPF (2024) explicitly allows for harm to designated heritage assets where this is justified and outweighed by public benefits, through a structured assessment of significance, harm and justification. The proposed policy wording fails to reflect this approach and is therefore inconsistent with national policy and legislation.

The use of mandatory language in Part 2 of the policy - specifically the wording ‘proposals that affect designated heritage assets, including alterations and extensions, retrofit or new development must’ - overstates the statutory and policy tests and removes the necessary scope for professional judgement and balancing.

In addition, the remainder of Part 2 of the policy, particularly criteria 2(b) - 2(d), adopts a highly restrictive approach by requiring development to be of an ‘appropriate’ scale, form, height and massing. When applied to development that is inherently different in scale or character from nearby listed buildings, these criteria risk effectively precluding larger-scale or strategic development regardless of wider public benefits. This is contrary to the direction of travel set out in the draft NPPF policy, policy E3 notes the locational

characteristics of logistics development which in some cases will involve particularly large structures. The policy lacks clarity as to how proposals of a different typology or scale should be assessed.

Policy GP/HA should therefore be amended to reflect the statutory wording and the NPPF approach, replacing mandatory language with more proportionate wording that allows impacts on heritage significance to be assessed in the round, taking account of scale, context and public benefits in accordance with legislation and national policy.

Policy GP/ND: Non-designated heritage assets

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to the proposed wording of Policy GP/NP.

The policy goes beyond national planning policy by seeking to ‘ensure the retention and enhancement’ of non-designated heritage assets. The NPPF does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public benefits.

Policy GP/ND should be amended to reflect the NPPF’s proportionate approach and allow impacts to be assessed through balanced decision-making.

Policy J/NE: New employment development proposals

Brookgate Land Ltd and Network Rail Infrastructure Ltd **support** Policy J/NE. Since the policy makes specific reference to site allocations, Brookgate Land Ltd and Network Rail Infrastructure Ltd request that the allocations be updated as set out above, to ensure that new employment development can be delivered in accordance with Policy J/NE.

Policy J/AW: Affordable workspace and creative industries

Brookgate Land Ltd and Network Rail Infrastructure Ltd request amendments to policy J/AW to ensure that the policy does not hinder the delivery of much needed commercial development in Cambridge, in line with wider growth ambitions.

In its current format, the policy is unclear on the scale and nature of the employment floorspace this would apply to, which makes it difficult to comment on the impacts. We welcome greater clarity on the requirements for affordable workspace as the policy develops.

It is firstly noted that it is imperative that a viability clause is added in to the policy wording. This could allow for negotiated contributions and provide justification for the alternative delivery mechanisms outlined in the policy such as off-site provision, or financial payments where on-site affordable workspace is not feasible.

Furthermore, it is requested that the policy is drafted to allow developers and/or occupiers an appropriate degree of control over the delivery of affordable workspace on-site. This should allow for flexibility on the location of affordable workspace within the development, duration of occupation and form of affordable workspace. A prescriptive approach where the Council are gifted control of affordable workspace would likely lead to incompatible development. A more flexible approach however, would allow for affordable workspace to be contextual and reasonable, so as to not undermine the developers’ wider ambition.

It is also noted that at point 2b, the policy allows affordable workspace to be managed and operated by the owner where they can *demonstrate the necessary skills and experience*. Given the absence of existing guidance, it should be clarified how an owner would demonstrate competence to deliver affordable workspace effectively.

Policy H/AH: Affordable Housing

Brookgate Land Ltd and Network Rail Infrastructure Ltd support the requirement for affordable housing as outlined in the draft local plan.

However, it is noted that viability testing is mentioned at point 9.15 of the supporting text. Brookgate Land Ltd and Network Rail Infrastructure Ltd consider that the appropriateness of viability tested route should be explicitly mentioned within the policy wording, rather than the supporting text. This will carry greater weight in decision making rather than being perceived as guidance or an aspiration, and will provide greater clarity for developers, especially in light of the increased % requirements for medium scale sites.

Policy H/CB: Self and Custom Build

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to the mandatory requirement for 5% self-build homes as part of any development. Such a blanket approach across all developments is unjustified and self-build provision should only be sought on sites where there is a demonstrable need. This would be inconsistent with the Self-build and Custom Housebuilding Act, which focuses on demand registers, not quotas.

The current wording of the policy requires that even flatted developments must provide 5% custom-build units. While the supporting text clarifies that self-build flats would be delivered as custom-finish units, these are often already incorporated by developers as part of standard delivery models. As such, the requirement does not result in any meaningful additional benefit but instead places an unnecessary and disproportionate burden on developers, particularly in higher-density schemes where viability and deliverability already constrained.

Policy H/BR: Build to Rent Homes

Brookgate Land Ltd and Network Rail Infrastructure Ltd **support** the policy for Build to Rent Homes in Cambridge.

As set out in Brookgate Land Ltd and Network Rail Infrastructure Ltd's representations to the Regulation 18 consultation in 2021, we object to the imposition of rigid restrictions on development quantum as outlined in point (a). Such blanket limitations risk unnecessarily constraining appropriate and well-designed development and fail to reflect the varied context and characteristics of individual sites.

Furthermore, it is proposed to remove reference to '*dominate*' within the policy. Not only is this inherently subjective and open to inconsistent interpretation, but it has not been proven that build to rent has any impact on the character of a wider area in which it is located. In fact, build to rent development can deliver high-quality, long-term, and stable rental alternatives. It is therefore considered that the removal of '*dominate*' will allow proposals to be assessed on a case-by-case basis, having regard to site-specific circumstances, design quality, and demonstrable planning benefits.

To be effective, the policy should retain sufficient flexibility to respond to changing needs, market conditions, and allow for the delivery of different forms of residential development to meet housing targets.

Policy I/EV: Parking and electric vehicles

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to the proposed wording of Policy I/EV.

The policy would be more effective if it clearly recognised that car parking and EV charging provision must respond to the specific characteristics of individual sites. Large or complex developments often have

distinct operational requirements, travel patterns and accessibility constraints that cannot be addressed through uniform or prescriptive standards.

Brookgate Land Ltd and Network Rail Infrastructure Ltd support the objective of ensuring parking provision reflects land use, location, accessibility and EV infrastructure. The policy should therefore adopt a proportionate, evidence-based and site-specific approach, consistent with national policy, to support sustainable transport objectives without undermining development viability or deliverability.

Policy I/SI: Safeguarding important infrastructure

Set out on the draft policies map is an area of land to be safeguarded for the East West Rail Scheme, which encroaches on the allocations at Station Road West and North East Cambridge including the Chesterton Siding site specifically. This is shown in figure 2 below.

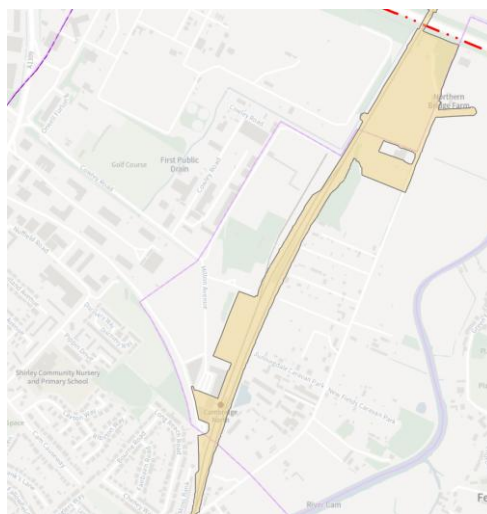


Figure 2 – E2W Safeguarded Area at North East Cambridge taken from draft policies map.

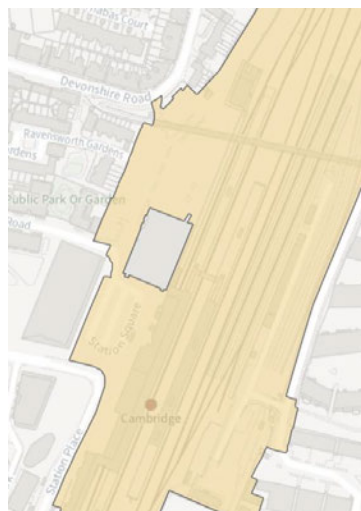


Figure 3 – E2W Safeguarded Area at Station Road West taken from draft policies map.

It is acknowledged that the safeguarding area identified in figures 2 and 3 has been established by EWR and has undergone separate consultation with landowners. Brookgate Land Ltd has submitted comments to EWR during this consultation, highlighting that the proposed safeguarding land should align with the hybrid planning consent at Cambridge North East. Notably, the land identified for safeguarding includes

areas where car parking is to be re-provided for the station in accordance with the franchise agreement. Accordingly, it is requested that the policy be drafted with sufficient flexibility to accommodate evolving EWR requirements within safeguarded areas, rather than automatically resisting development within these zones.

Furthermore, the proposed extent of the safeguarded area at Station Road West would effectively sterilise all development on the Site, a critical issue that has not been addressed within the site allocation. Similar to the above, the safeguarded area does not take into account the two planning permissions that have previously been granted on the Site. The policy should therefore be reviewed to ensure it does not place a restriction on all development in this safeguarding zone and undermine the deliverability of the allocation.

Policy I/ID: Infrastructure and Delivery

Brookgate Land Ltd and Network Rail Infrastructure Ltd **object** to policy I/ID as currently worded.


The policy makes continual reference to Community Infrastructure as a way to ensure that schemes are acceptable in planning terms (in addition being mentioned under Policy I/ST: Sustainable transport and connectivity and Policy: WS/NC: Meeting the needs of new and growing communities). As CIL has not been adopted in the Greater Cambridge Area, the mechanism for securing contributions via CIL does not yet exist and therefore it is premature to reference this in policy. It is recommended that the policy instead only refers to planning obligations or contributions via S106 agreements. This will ensure that the policy is clear, justified, and effective as outlined within the NPPF.

The policy also seeks to ensure sufficient infrastructure capacity to support new development, requiring developers to deliver or fund infrastructure, including via Section 106 or CIL. While the objective of adequate infrastructure is supported, the policy should not allow objections from utility providers, such as water companies, to unreasonably delay or prevent development.

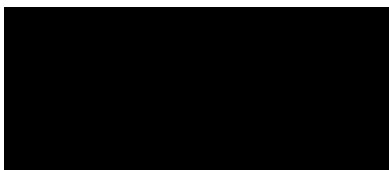
Development should not be halted solely on the basis of current capacity constraints where mitigation or phased delivery is feasible. Appropriate conditions and/or obligations should allow for capacity issues to be overcome to ensure that do not unduly restrict housing delivery or the timely delivery of development.

It is therefore requested that the policy and/or supporting text be revised to make clear that objections from utility companies cannot automatically prevent development, and that development should proceed where reasonable mitigation or planning mechanisms can address infrastructure requirements.

Conclusion

We hope you find the above representations useful and clear. Should any further information be required, please do not hesitate to contact me on 

Kind regards



Charlotte Tate
Principal Planner

Appendix 1 – Site Location Plan – Chesterton Sidings

