Babraham Research Campus
September 2026

BIDWELLS

BABRAHAM RESEARCH CAMPUS PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN 2024-2045 REGULATION 19 REPRESENTATIONS

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1.0 Introduction

1.1 These representations on the Proposed Submission Greater Cambridge Local Plan (Regulation 19) ('Local Plan') have been prepared by Bidwells LLP on behalf of Babraham Research Campus Ltd ('BRC Ltd'), who in turn represent the Campus Partners (UKRI, BBSRC, The Babraham Institute and BRC Ltd). The representations have been prepared in respect of the Land at Babraham Research Campus (also known as 'BRC').

1.2 Babraham Research Campus is identified as a Site Allocation within the rural southern cluster in the Local Plan, under **Policy S/BRC: Babraham Research Campus**, for mixed-use development.

1.3 These representations set out comments with a specific consideration of the requirements of Paragraph 36 of the National Planning Policy Framework ('NPPF') (2024) which states that when examining local plans they should be examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are 'sound'. A plan is considered 'sound' if it is:

a) Positively prepared – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs[20]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

b) Justified – *an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence;*

c) Effective – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) Consistent with national policy – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

1.4 These representations also take account of Paragraph 16 of the NPPF (2024) which states that Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development[10];

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

1.5 Whilst the GCLP will be examined against the NPPF (2024), due to transitional arrangements once adopted (anticipated 2028), the NPPF (2026) will be the relevant material consideration in terms of national policy that future development proposals will be assessed against. Annex A (Paragraph 2) of the NPPF (2026) states that development plan polices which are materially inconsistent with the national decision-making polices ('NDMPs') in the NPPF should be given very limited weight. As such the below representations take account of this and where necessary comment on the consistency of polices with the NDMPs set out within the NPPF (2026).

1.6 These representations follow those previously submitted to the Regulation 18 consultation. The earlier submissions made by BRC Ltd in support of the Site remain up to date and relevant. The site remains available, suitable and deliverable. This representation adds to the suite of submission material previously submitted and accounts for changes to the emerging Greater Cambridge Local Plan and updated national policy, notably the National Planning Policy Framework (NPPF). This representation considers the Site Allocation policy and relevant policies relating to the wider Development Strategy and development management policies proposed in the Plan.

1.7 There remains a significant demonstrable unmet need for further employment and residential development at Babraham Research Campus. To address this need, an outline planning application for mixed-use development of the Campus was submitted to the Greater Cambridge Shared Planning Service in December 2025 (LPA Ref. 25/04634/OUT). At the time of writing, the application is pending determination. The outline planning application demonstrates a comprehensive approach to the redevelopment of the Campus and is considered to continue to fully accord with the aims and objectives of draft policy S//BRC.

1.8 These representations continue to broadly support the draft policy allocation S/BRC, subject to additional proposed amendments to the policy wording and supporting Indicatvie Spatial Framework which builds on the representations previously submitted.

2.0 Policy S/BRC: Babraham Research Campus

2.1 BRC Ltd **object** to Policy S/BRC. The Policy is unsound as it is not effective.

2.2 Whilst BRC Ltd support the principle of the allocation of Babraham Research Campus for mixed-use development to support the future needs of the campus, they wish to make changes to the policy wording, as detailed below. There are still large sections of the policy that include unnecessary duplication together with areas that require more precise wording that is consistent with national policy.

2.3 Any proposed deletions to the policy wording are shown as strikethrough text and any additions to the policy wording are shown in red text. The justification for the changes are set out in turn under each sub-heading and in italics.

Policy S/BRC: Babraham Research Campus

~~1. A site wide Masterplan will be prepared by the landowners and/or promoters in conjunction with the Council and in consultation with the local community and other stakeholders. The Masterplan should be broadly aligned with the indicative Spatial Framework shown at Figure 75 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing and will be used as a basis for the consideration of subsequent planning applications. The Masterplan should be agreed by the Council prior to the approval of any planning applications (and may be subsequently updated by the landowners and/or promoters and agreed by the Local Planning Authorities).~~

~~2. Given the scale and long term construction of the development, a site wide Design Code must be submitted alongside the Masterplan. This will set the overarching design and placemaking objectives and principles, ensuring that each phase of future development positively contributes towards the high quality outcomes expected.~~

Justification for proposed amendments to wording of Policy

Parts 1 and 2 unnecessarily duplicates part 15 of the policy.

Objectives and Place Identity

3. Babraham Research Campus will continue to be a world leading bioscience research and innovation campus, co-locating start up, growing and established bioscience companies. Located at the heart of the Cambridge Southern Cluster life science ecosystem, the campus will continue to play a key role in bringing together academia and commercial bioscience. It will continue to develop into a place where people can live and work, set within an extensive network of green and blue infrastructure which supports both biodiversity and the health and wellbeing of employees and the wider community.

Uses

4. Babraham Research Campus, including land removed from the Green Belt, is allocated for mixed use development comprising:
    a. Within the employment-led development area, approximately 48,000 square metres gross internal area (GIA) additional research and development (Class (E(g)(ii)) floorspace; and
    b. Within the residential-led development area:

i. Approximately 83 additional Campus worker and affordable homes to support the needs of the Campus; and

ii. Appropriate supporting ancillary uses and infrastructure, including ~~up to~~ approximately 850 square metres gross internal area of nursery space (class (E(f)), and 500 square metres of flexible amenity space (Class F2 (a), (b), and Class E (a), (b), (d)).

5. Development involving the provision of housing will be required to meet the National Planning Policy Framework Golden Rules for land released from Green Belt~~, including providing 50% affordable housing on residential schemes.~~

~~a. Delivery of uses in the Strategic Enhancement Area (SEA), including:~~

~~i. Compensating for the loss of Green Belt by enhancing the land in the SEA with green infrastructure and accessible open and green space;~~

~~ii. Mitigate any adverse impacts of new development on the setting of the Cambridge Green Belt and wider landscape;~~

~~iii. Sustainable drainage systems (SuDS) such as swales, wetlands and reed beds; and~~

~~iv. Creating new habitats for wildlife and, habitat compensation through the provision of same or better quality habitat conditions.~~

Justification for proposed amendments to wording of Policy

The changes to the wording at part 5 are to ensure the policy is consistent with national policy in terms of the Golden Rules applying only to major development involving the provision of housing on land released from the Green Belt through plan preparation or review (GB8 of NPPF (2026)) and so that it simply refers to the 'Golden Rules' requirements (which expands beyond affordable housing). The deletion of part (a) is also required as this duplicates part 17 of the policy.

The development of Babraham Research Campus must do the following (in accordance with the Indicative Spatial Framework):

Context

6. Through the preparation of a Landscape Visual Impact Assessment and more detailed Heritage Impact Assessment, inform specific mitigations and protect, and where appropriate, enhance the significance of heritage assets and their setting, including the Grade I Listed St Peter's Church, Grade II* Listed Babraham Hall, Babraham Conservation Area and nearby ~~off-site~~ heritage assets.

7. ~~Protect the legibility, appearance, and rural character of the Babraham Conservation area and the Lodge building which should be retained, a non-designated heritage asset~~.

8. Limit development of new buildings to areas of existing development, undeveloped areas of land in the far north of the site, and The Close residential area. Gardens surrounding the Grade I Church and Grade II* Babraham Hall ~~must~~ should be retained as open space, as indicated on the Spatial Framework ~~excluded from development~~.

9. Retain, preserve and enhance key short and long-range views from, into and within the site as indicated on the Indicative Spatial Framework, ~~including facing west and east from Babraham Hall along The Avenue, and internal views of heritage assets and the formal gardens / open spaces to the south of the River Granta,~~ by:

a. Ensuring ~~development~~ buildings sit~~s~~ below the tree canopy; and, ~~existing tree line~~;

~~b. Incorporating landscape and tree buffers, including forest scale trees and under storey planting where appropriate;~~

c. Responding sensitively to the setting of heritage assets within the site when redeveloping existing buildings; ~~and~~

~~d. Preparing a Views Analysis to inform specific mitigations~~

10. Retain and, where possible, supplement the existing tree coverage and landscape buffers, across the site, including forest scale trees and under storey planting where appropriate, to limit the visual impact of development on heritage assets, views and landscape setting.

11. ~~In accordance with the indicative Spatial Framework for the site, create a wide landscape buffer (minimum 20 metres) in/adjacent to any development in the north west of site in order to satisfactorily mitigate any adverse impacts of new development on the setting of the Cambridge Green Belt and wider landscape character including views to the north from Gog Magog Hills and Roman Road, whilst creating an attractive gateway into the campus from the north~~.

12. Apply the sequential approach to flood risk within the site, ensuring any development is subject to appropriate mitigation and does not increase flood risk elsewhere. Only water compatible development should be located within Flood Zone 3 and a site specific FRA will need to further assess the potential for groundwater flooding to inform the need for appropriate mitigation measures. The SEA is an appropriate location for flood risk mitigation.

13. Given the known significant potential for archaeological remains in this area, development proposals must be accompanied by an appropriate archaeological assessment, which includes information on the significance of the heritage asset, including the extent, character and condition of the archaeological resource and the likely impact of the development on the archaeological remains.

Justification of proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous and has a clear purpose, as per requirements in paragraph 16 (d) of the NPPF (2024).

There are many instances where there is unnecessary duplication and where parts of the policy could be consolidated. In particular, in terms of assessment and mitigation of impacts upon the significance of heritage assets. This is especially important given that the policy currently extends to 34 parts. There is also reference to the 'Lodge Building' but it is not clear which Lodge (there are two – Babraham Lodge and Linton Lodge). The suggested wording seeks to provide clearer wording and avoid duplication.

The reference, at part 11, to a requirement for a '…wide landscape buffer (minimum 20 metres) in/adjacent to any development in the north-west of site…' is not considered to be justified or based on evidence. Indeed, the Cambridge Green Belt Study (2021) identifies that the Campus makes a relatively limited contribution to Green Belt purposes, and the harm of its release would be low. The policy also does not acknowledge the existing, established perimeter woodland belt that runs to the west and north of the proposed employment-led development in the north of the Campus. This woodland belt is within the wider Campus estate and therefore within the ownership of the Campus and is proposed to be retained. Ultimately, this is a matter to be dealt with via detailed assessment (including a Landscape and Visual Impact Assessment) relating to a site-specific proposal as part of any planning application process.

Built Form

14. Ensure the built area of the C~~c~~ampus is contained within the site allocation boundary shown on the policies map and the indicative Spatial Framework Diagram.

Context

15. Be comprehensively planned and delivered to ensure development proposals are fully integrated with the wider Campus and to preserve and enhance the setting of identified heritage assets. This must involve:

    a. Preparing a site-wide Masterplan, which must be submitted for approval by the Local Planning Authority as part of the first application for planning permission; and

    b. Preparing a site-wide Design Code~~s~~ for ~~each phase of~~ the development to ensure a high quality of development, which must be submitted and approved before the first reserved matters planning application is determined.

16. Beyond the Site Allocation Boundary, other associated uses and mitigation may be provided in the Strategic Enhancement Area (S/SEA/BRC), including drainage, habitat compensation, sustainable and active travel infrastructure and green space.

Justification for proposed amendments to wording of policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

With reference to part 15 (b) of the Policy, reference should be made to a Site-Wide Design Code as opposed to Design Codes for each phase of development. This is to ensure the Policy is not overly prescriptive and reflects the approach agreed with officers at Greater Cambridge Shared Planning (GCSP) service in respect of application 25/04634/OUT. The approach was to prepare a Site-Wide Design Code but which includes for site-wide coding as well as coding for the three character areas (residential, central and expansion area within north-west of campus). The Code also includes a section on phasing.

It is also noted that the requirement for a Design Code for each phase is directly contradictory to the requirements for a site-wide design code set out in paragraph 2 of the policy which is proposed to be consolidated with point 15 to avoid duplication.

The additional text at part 16 is proposed for clarity and to be consistent with the approach adopted elsewhere in the Plan as it relates to Strategic Enhancement Areas.

Nature

16. Maintain and enhance the wider landscape within the Campus, including the corridor of the River Granta.

17. Proposals ~~Deliver compensatory improvements to the environmental quality and accessibility of remaining Green Belt land~~ in the Strategic Enhancement Area (S/SEA/BRC) must:

    ~~, in line with a Green Belt Enhancement Strategy for the area prepared by the applicant. This should :~~

    a. Provide new green space or improvements to existing green space, which is accessible to the public, including measures such as walking loops, new wetlands, restoration of ponds, and other associated green infrastructure projects;

b. ~~Incorporate the enhancement of~~ Enhance existing hedgerows ~~and~~, woodland and habitat ~~that form the~~ particularly those forming the eastern and western boundaries of the site~~, particularly to the east and west~~;including new habitats, where appropriate, ~~and~~

c. Contribute to mitigating any adverse effects of the development on the setting of the wider Cambridge Green Belt and landscape;

d. Include sustainable drainage features, such as swales, wetlands and reed beds; and

e. ~~Ensure measures i~~Integrate with the green and blue infrastructure network across the site and in the wider area.

Justification for proposed amendments to policy wording

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous and avoids duplication, as per requirements in paragraph 16 (d) and (f)of the NPPF (2024).

The proposed text at point 17 has been updated to combine with the text removed from point 5a and added at new point 16, to ensure it is consistent with national policy and the application of Strategic Enhancement Areas elsewhere within the Plan and to consolidate the requirements for the SEA within the policy.

Movement

18. Ensure proposals improve movement within the Campus and deliver connections to high-quality sustainable transport, by:

    a. Securing improvements to pedestrian and cycle and equestrian routes connecting to nearby villages, railway stations and the proposed Cambridge South East Transport (CSET) travel hub;

    b. Supporting the provision of high-quality routes to existing forms of public transport, including routes to nearby bus-stops and the provision of an on-site Mobility Hub; and

    c. Contributing to and securing high-quality local public transport routes to and from the Site ~~nearby railway stations, employment campuses and Cambridge City Centre~~, including ~~via~~ the Cambridge South East Transport schemes (CSET).

19. Where required, contribute financially to strategic public transport and active travel schemes and highways mitigation in the south-east corridor, appropriate to the scale and nature of the development.

20. A trip budget based on detailed evidence must be agreed with the Local Highways Authority prior to submission of the outline application, together with a strategic and local transport mitigation plan. A monitor and manage approach will be taken to ensure that the development remains within the agreed trip budget for the site throughout its delivery.

21. To support delivery of the agreed campus-wide masterplan, a strategic and local transport mitigation plan must be prepared by the Campus stakeholders ~~developer~~ in consultation with the Local Highways Authority and Local Planning Authority.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

The employment-led development must, additionally, do the following (in accordance with the indicative Spatial Framework):

Uses

22. Support research and development (Class E(g)ii)) floorspace and supporting uses. Future development proposals will need to deliver spaces for start-ups and the Babraham Institute, and these units should be located close to the centre of the site.

Built Form

23. Be limited to the employment-led development area identified in the indicative Spatial Framework.
24. Encourage opportunities for collaboration between future occupants~~, including delivering communal facilities on the ground floors,~~ including communal space within the centre of the Campus designed for meeting, socialising and holding events
25. Be of high quality and innovative design which reflects the cutting-edge science which takes place within them whilst enhancing the heritage assets, preserving the rural character and sense of openness of the sites' context.

~~26. Deliver active ground floor uses and frontages wherever possible.~~

~~27. Respond positively to the site's immediate context, in particular heritage assets Grade I Listed St Peter's Church, Grade II Listed Babraham Hall, and their setting, wider landscape character and identified key views, through the selection of massing, material palettes and overall design of new research and development buildings.~~

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per the requirements in Paragraph 16 (d) of the NPPF (2024).

The suggested wording above more clearly and accurately reflect up to date assessment work undertaken by the Campus to inform their future masterplan. This has been subject to discussion with officers at Greater Cambridge Shared Planning Service and has formed part of the proposals of application 25/04634/OUT. The suggested changes also avoid unnecessary duplication within the policy wording.

The requirement under part 26 to deliver active ground floor uses and frontages wherever possible is overly prescriptive. Ultimately, this is a matter to be dealt with via detailed assessment relating to a site-specific proposal as part of any planning application process. Furthermore, R&D buildings at the Campus cannot have an open door policy

Public Space

28. Include enhanced meeting places as part of the public realm and open spaces

The residential-led development must, additionally, do the following (in accordance with the indicative Spatial Framework):

Uses

29. Be limited to addressing the needs for campus worker housing, with the mix of typologies and tenures (including affordable housing) informed by an accommodation needs assessment for

the campus, the Greater Cambridge Housing Strategy, and discussions with the Local Planning Authority.

30. Provide ancillary uses to meet the daily needs of residents, including a new, expanded Nursery and a new amenity building capable of accommodating flexible space to address Campus and local needs, e.g. small shop and gym, both of which must be open to the wider public and not undermine the viability of existing services in the village.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous, as per requirements in paragraph 16 (d) of the NPPF (2024).

The suggested wording more clearly and accurately reflects up to date assessment work undertaken by the Campus to inform their future masterplan. This has been subject to discussion with officers at Greater Cambridge Shared Planning Service and has formed part of the proposals of application 25/04634/OU

Built Form

31. Be located in the residential-led development area identified in the indicative Spatial Framework.
32. ~~Deliver active ground floor uses wherever possible~~.
33. Take a comprehensive, landscape-led approach to the design through the preparation of a Masterplan, which must be prepared by the applicant and submitted as part of the planning application for this part of the site. This must ensure development:
    a. Maintains the low-density character of the site;
    b. Secures building design which is sympathetic to the sensitive village-edge location; and
    c. Focuses development as near to the Babraham High Street as possible.

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan is clearly written and unambiguous and has a clear purpose, as per requirements in paragraph 16 (d) and (f) of the NPPF (2024).

The requirement under part 32 to deliver active ground floor uses and frontages wherever possible is overly prescriptive. Ultimately, this is a matter to be dealt with via detailed assessment relating to a site-specific proposal as part of any planning application process. Furthermore, R&D buildings at the Campus cannot have an open door policy

Lifespan

34. In addition to the requirements on the validation checklist, the following will be required at the submission of an outline or major planning application:
    a. Phasing and delivery plan, including indicative costings and potential delivery through Section 106 agreements or CIL;
    b. A Parking strategy;
    c. An Integrated water management plan;
    ~~d. A Waste management plan;~~
    ~~e. A Site Specific Flood Risk Assessment; and~~

~~f. A strategic and local transport mitigation plan (in consultation with the Local Highways Authority and Local Planning Authority).~~

Justification for proposed amendments to wording of Policy

The above changes to the wording of the policy are proposed in order to ensure the Plan avoids unnecessary duplications of policies, per requirements in paragraph 16 (f) of the NPPF (2024). The requirements such as a Flood Risk Assessment and Waste Management Plan are already included within the validation criteria, as well as Development Management Policies and therefore do not need to be duplicated under the policy. The requirement for a strategic and local transport mitigation plan is also already provided at part 21 of the policy.

Figure 75: Indicative Spatial Framework for Policy S/RSC/BRC: Babraham Research Campus

2.4 BRC Ltd **objects** to the Indicative Spatial Framework (Figure 75) as currently drafted.

2.5 The following changes are requested to be made:

- Amend the title, as follows - 'Figure 75: Indicative Spatial Framework for Policy S/~~RSC/~~BRC: Babraham Research Campus'
- Remove green block of colour in north-west of the site, within the Site Allocation boundary. The 'landscape buffer' hatching has been removed as per representations made at Regulation 18 stage for this area but the green colour is still showing on the plan
- Remove 'Commercial Led Development' blocks and simply refer to whole of this part of the Campus as 'Employment-Led Development' – as per the wording within Policy S/BRC
- Remove 'local nature reserve' labelling. This remains incorrect and there is existing built development in these locations which should be acknowledged and shown on the plan and legend
- Correctly show the alignment of the CSET Route. This is still not correct as it is much further south than currently shown
- Show the entirety of the Strategic Enhancement Area on the Plan for clarity.

3.0 Greater Cambridge Policies Map (2026) : Babraham Inset Map

3.1 BRC Ltd **object** to the Greater Cambridge Policies Map (2026) : Babraham Inset Map. It is unsound as it not effective.

3.2 The Inset map incorrectly as the annotation for the Strategic Enhancement Area as 'S/AMC/BRC'. This should be corrected to 'S/SEA/BRC'. The Strategic Enhancement Area at BRC is a Policy Area not an Area of Major Change.

4.0 Policy S/JH: New Jobs and Homes

4.1 BRC Ltd **object** to Policy S/JH: New Jobs and Homes. The policy is unsound as it is not positively prepared, not justified, not effective and inconsistent with national policy.

4.2 In terms of the policy context, paragraph 69 of the NPPF (2024) is clear that Authorities need to plan for higher levels of growth than the Standard Method requirement to reflect growth ambitions linked to economic development and infrastructure investment. Furthermore, paragraph 86(d) of the NPPF (2024) confirms that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment. The draft Plan does not do this.

4.3 This need for growth is evidenced by national, regional and authority level investment in infrastructure including the new Cambridge South Railway Station providing direct connectivity between Cambridge Biomedical Campus (CBC) and London, the granting of the Cambourne to Cambridge busway and progression of Cambridge South East Transport (CSET) to inquiry later this year. In a national context, the commitment to East West Rail establishes the area as one benefiting from continued investment in major transport infrastructure. Growth envisioned by Government is set to be realised and delivered by the Greater Cambridge Development Corporation set to deliver infrastructure first growth. We contend in order to ensure the Plan is found sound the unique nature of Cambridge and its projected capacity for growth must be realised within the emerging Local Plan.

4.4 The fact that the GCLP is not planning for the level of growth necessary to support the economic ambitions of the Local Growth Plan, which align with the economic objectives of the government is underlined by the fact that the Employment and Housing Needs Update (EHNU) (2026) does not even consider the Oxford Cambridge Arc or the Local Growth Plan. Instead, it has been developed on the basis of standard economic forecasts which are inevitably trend-based and so do not account for economic potential of the area as is necessary to align with local and national economic ambitions. The EHNU draws its conclusions and jobs and housing needs from the 'central growth' scenario with the 'higher growth scenario' dismissed. However, it is noted the EHNU notes that the higher scenario could be achieved with step change in investment.

4.5 Rightly the EHNU draws a relationship between job growth and housing need, on the basis that greater job growth in the region will generate a derived demand for housing, creating an interdependency between the two. The 'central growth scenario,' as outlined within the EHNU, builds in assumptions of slower periods of growth, contractions, and economic shocks. Inherently both the number of jobs and homes proposed within the Proposed Submission Plan are conservative rather than reflective of the full growth potential of the Greater Cambridge economy.

4.6 With the advent of the Greater Cambridge Development Corporation (backed by £400 million of central government funding) and renewed commitment to delivery of growth in the Oxford – Cambridge Growth Corridor there is clear rationale for the Authority to reasonably adopt the high growth scenario. Furthermore whilst the Authority have met their identified needs for housing via the Standard Method it is acknowledged the Standard Method does not take into account the specific growth agenda and focus on Cambridge as an area of 'supercharged growth'.

4.7 It is evident that committed and future infrastructure projects in Greater Cambridge continue to confirm Cambridge's position as an area capable of supporting and delivering high growth. Within

this context Cambridge remains a priority of the incumbent Labour government to deliver 'supercharged growth'. 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.

4.8 We also note the Regulation 18 version of the emerging Local Plan required 2,463 dwellings per annum to deliver employment growth of 66,000 jobs compared to the Regulation 19 version which required delivery of 2,292 dwellings per annum to deliver 73,200 jobs across the plan period; representing a decrease in housing delivery whilst reflecting an increase in job creation. The EHNU reasons this in stating the fact that average household sizes are now larger, leading to an increase in people of working age and more in-commuting which reduces the number of local people required to fill jobs created. We raise concern this is an unsustainable approach to development strategy and reflects a local housing market where many young people are unable to move out of their family homes and move closer to or within Cambridge where jobs are located at key existing and development employment centres such as CB1, Cambridge Biomedical Campus and Cambridge Science Park. We advocate the Plan needs to address the affordability of housing within Greater Cambridge by planning for increased growth and supply to reflect growing demand rather than embed the issue of increasing household size.

4.9 In doing so and making provision for increased housing stock in Greater Cambridge in sustainable locations would ensure the Local Plan promotes more suitable patterns of travel as required by paragraph 111 of the NPPF (2024) using planning polices to minimise the length of and journeys required for employment.

Changes required to the Plan

4.10 In order to overcome the issues highlighted in this representation and progress a sound Local Plan, it will be necessary to utilise more optimistic and realistic figures for job and housing numbers and include explicit support for higher-growth scenarios. Without these changes, Policy S/JH risks being unsound and inconsistent with national policy objectives to support sustainable economic growth and productivity.

5.0 Policy S/DS: Development Strategy

5.1 BRC Ltd **object** to policy S/DS: Development Strategy. The policy is unsound as it is not justified.

5.2 Whilst BRC Ltd broadly support Policy S/DS in terms of the identification of Babraham Research Campus as a new employment, mixed-use allocation in the Rural Southern Cluster, they do have minor observations on the policy wording at part d (ii) as outlined below. Any proposed deletions to the policy wording are shown as strikethrough text and any additions to the policy wording are shown as red text.

ii. *Babraham Research Campus - an employment-led mixed use allocation to support further growth of this existing world leading bioscience research and innovation campus and improve the health and wellbeing of future employees, residents and the local community through targeted environmental enhancements: including approximately 48,000 square metres employment floorspace for office and research & development 83 ~~43~~ additional homes ~~(all to be delivered within the plan period),~~ supported by focused additional facilities that complement existing local services;*

5.3 The above changes are once more required to ensure the Plan is clearly written as per the requirements in NPPF Paragraph 16 (d) (2024) and to reflect the agreed approach with officers at Greater Cambridge Shared Planning Service ('GCSPS') in respect of the current outline planning application pending determination (LPA Ref. 26/04634/OUT) and the numbers included in the site-specific policy **S/BRC.**

5.4 BRC Ltd also objects to the new wording requiring the additional homes to be '*all to be delivered within the plan period'* and proposed that this requirement should be deleted. It is unnecessary and inconsistent with the structure of Policy S/DS, which already establishes the appropriate mechanism for considering the timing of housing delivery. Paragraph 4 of Policy S/DS states that **'***Delivery across the plan period is set out in the housing trajectory included in Appendix D.*' The Plan therefore draws a clear distinction between identifying land as suitable for allocation and determining, through the trajectory, the expected timing and quantum of delivery over the plan period.

5.5 Including an additional policy requirement that all additional homes must be completed within the plan period cuts across that approach. The housing trajectory is the evidence-based tool identified by the Plan itself for assessing delivery, taking account of relevant matters such as lead-in times, planning status, infrastructure requirements, reserved matters or subsequent approvals and anticipated build-out rates. Those matters may change over time and are properly assessed through the trajectory and monitoring process, not fixed as an inflexible requirement within the site allocation wording.

5.6 The requirement is also not applied consistently. Other site allocations within the 'Rest of the Rural Area' are not subject to an equivalent requirement that their housing component must be delivered in full within the plan period. No justification is provided for imposing this additional constraint on Babraham Research Campus.

6.0 Policy CC/DC: Designing for a changing climate

6.1 BRC Ltd **object** to Policy CC/DC: Designing for a changing climate. The policy is unsound as it not effective.

6.2 Whilst the principle of minimising overheating and reducing reliance on energy-intensive cooling is supported, concern is raised that the policy does not adequately recognise the specialist operational requirements associated with R&D and laboratory uses such as those existing and proposed at Babraham Research Campus.

6.3 Such buildings can have fundamentally different requirements to conventional office or residential development, including controlled internal environments, specialist ventilation and air-handling requirements, significant internal heat loads arising from equipment, and particular security and contamination-control requirements. As a result, measures identified within the cooling hierarchy, including natural ventilation, night-time purge ventilation and particular glazing arrangements, may not always be technically appropriate or compatible with the intended operation of an R&D building. Equally, mechanical ventilation and cooling may be an integral operational requirement rather than simply a design choice, which under CC/DC can only be considered once passive alternatives have been exhausted.

Changes required to the Plan

6.4 The requirement at Part (d) for full-building mechanical ventilation and cooling to be considered only after **'***all other elements of the hierarchy have been utilised'* is therefore considered unnecessarily prescriptive and could constrain the appropriate design and operation of specialist R&D development. The policy should recognise that the cooling hierarchy is not capable of being applied uniformly across all development types and should instead allow measures higher within the hierarchy to be considered and incorporated where compatible with the operational requirements of the proposed use. Point (d) should therefore be amended to provide this flexibility, ensuring that the policy continues to secure climate-responsive development without compromising the functionality or delivery of specialist R&D and laboratory floorspace.

6.5 With regards to the inclusion of 'albedo' (2(a)[i]), it is requested this must be quantified to avoid ambiguity and inconsistency when preparing applications for development proposals. Without quantification the inclusion of 'albedo' should be removed from the policy to avoid introducing an unnecessary and undefined requirement for applicants to adhere to.

6.6 Furthermore, point 2(a)[iii] is considered too loosely worded with no clear definition of the requirements to 'minimise internal heat generation'. Without quantifying a requirement, the draft policy risks being redundant and not providing clear guidance on the expectations of the Council with regards to internal heat generation. As currently worded the draft policy is not considered to be effective or justified and risks being ambiguous and ineffective.

7.0 Policy CC/NZ: Net zero carbon new buildings

7.1 BRC Ltd **object** to Policy CC/NZ as currently drafted. The Policy is unsound as it is inconsistent with national policy.

7.2 Whilst BRC Ltd welcome the ambition to ensure that all buildings help to meet net-zero carbon targets, there needs to be greater flexibility within the policy wording.

7.3 The requirement for new development to achieve net zero operational emissions is considered onerous and goes beyond the requirements of the Building Regulations. In addition, the requirement of achieving net zero in all new development has not been given due consideration in terms of viability within the Viability Report and hence threatens to challenge the deliverability of residential development across the Authority Area.

7.4 Further, with regards to Part A (Space Heating) the requirement for dwellings to achieve a space heating demand of 15-20kwH per meter squared per year accords with the Climate Change Committees, LETI Net Zero definition and Passivhaus standard, which are higher than other national standards and hence place unrealistic and onerous expectations on developers.

7.5 With regard to Part B of the Policy (Total Energy Use Intensity, EUI), 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.

7.6 Reliance on CIBSE TM54 modelling, which is MEP-led, overlaps with energy performance assessments already embedded within Excellent/Outstanding BREEAM requirements under Ene 01. This duplication may reduce certainty without adding meaningful environmental benefit.

Changes required to the Plan

7.7 Whilst it is acknowledged the GCLP will be examined against the NPPF (2024), the introduction of PM13 within the NPPF (2026) establishes a clear direction from national government that standards within local plans should not exceed national expectations unless fully evidenced.

7.8 To ensure the GCLP continues to be consistent with national policy and is positively prepared, it is requested therefore that parts A and B of the Policy are deleted and replaced with a policy that is consistent with the NPPF (2026). BRC Ltd encourages a proportionate, evidence-based approach that reflects realistic delivery stages and aligns with existing standards. Any policies exceeding Building Regulation standards would need to be based on robust and credible evidence including demonstrating their viability in the local development market.

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

8.1 BRC Ltd wish to **object** to policy CC/CE for the reasons set out below.

8.2 Part 1 of the draft policy requires all development proposals to 'proportionately' take opportunities to reduce the development's embodied carbon content. As currently worded the policy is considered too vague and does not set any clear defined parameters or boundaries for schemes to meet. Without clear boundaries, it is unclear if this policy requirement will threaten the viability of development.

8.3 Part 2 of the policy requires any proposals that involve demolition to be accompanied by full justification for demolition. This requirement does not reflect the provisions made under The Town and Country Planning (General Permitted Development (England) Order 2015 which under Class B sets out the Permitted Development rights for demolition of a building. Requiring full justification for demolition of a building to be provided would hence be inconsistent with the legislative procedure for building demolition set out within Class B. As currently worded, the draft policy is hence considered unjustified and inconsistent with national policy. Furthermore, the policy fails to adequately recognise the wider benefits that demolition and redevelopment can deliver including regeneration, improved building performance, economic growth, and enhanced sustainability outcomes. As drafted, the policy risks preventing otherwise sustainable and beneficial redevelopment proposals to come forward. The presumption in favour of retention and reuse should therefore be amended to allow greater consideration of site-specific circumstances and the wider benefits of redevelopment.

8.4 Furthermore, Part 2(d) requires proposals involving demolition to demonstrate, on an 'exceptional basis', significant benefits which outweigh the carbon savings that would arise from the repair or reuse of the existing building. In isolation, this requirement is considered unduly onerous and elevates embodied carbon above other material planning considerations. Whilst the objective of reducing embodied carbon is supported, carbon savings should form part of the wider planning balance rather than operate as a determinative test of whether demolition is acceptable. Existing buildings may remain technically capable of repair or refurbishment whilst nevertheless being functionally obsolete, incapable of meeting modern operational requirements, or materially constraining the efficient use, intensification and future development of a site. Redevelopment may therefore represent the more appropriate planning outcome for a range of legitimate reasons, including the efficient use of land, changing operational requirements, economic growth and the provision of modern R&D floorspace.

8.5 The approach is also considered to go beyond the requirements of the NPPF (2026). For the purposes of determining application proposals Policy CC2 (Mitigation of climate change) states substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and the use of renewable carbon sources. CC2 does not, nor does it anywhere else in the NPPF (2026) require that development only be approved where benefits would outweigh the carbon savings. It is hence considered the policy as currently worded is materially inconsistent with NPPF (2026) and would hence only be afforded limited weight in the determination of future applications.

Changes required to the Plan

8.6 Part 2 of the Policy should be reworded to promote the retention, reuse and renovation of existing buildings where possible, but remove the detailed justification requirements set out in sub points a-d, allowing development proposals to come forward and demolition justified on their own merit. This would allow embodied carbon to be taken into the planning balance in the same manner in which other material considerations are.

9.0 Policy CC/IW: Integrated water management, sustainable drainage and water quality

9.1 BRC Ltd **object** to Policy CC/IW. The policy is unsound as it is not justified.

9.2 Part 6a of the policy states development must demonstrate that there is capacity for waste water treatment and adequate wastewater conveyancing infrastructure to support the whole development. BRC Ltd does not consider this approach to be sound on the basis that water infrastructure providers have a legal requirement to provide the necessary infrastructure to meet the needs of Greater Cambridge's current and future population and that it should not be for house builders and other developers to address the failings of water companies to upgrade infrastructure.

9.3 When considering water and wastewater capacity it must be recognised that water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

> *"S37 General duty to maintain water supply system etc. (1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made— (a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and (b) for maintaining, improving, and extending the water undertaker's water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part. (2) The duty of a water undertaker under this section shall be enforceable under section 18 above— (a) by the Secretary of State; or (b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director."*

9.4 Section 106 of the WIA 1991 confers the power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer. Specifically, in relation to wastewater, the Supreme Court considered this matter in 2009 – see Barratt versus Welsh Water [2009] UKSC 13. Paragraph 23 of the decision is salient. Given its importance in the context of wastewater it is recited in full below:

> *"The right to connect to a public sewer afforded by section 106 of the 1991 Act and its predecessors has been described as an "absolute right". The sewerage undertaker cannot refuse to permit the connection on the ground that the additional discharge into the system will overload it. The burden of dealing with the consequences of this additional discharge falls directly upon the undertaker and the consequent expense is shared by all who pay sewerage charges to the undertaker. Thus, in Ainley v Kirkheaton Local Board (1891) 60 LJ (Ch) 734 Stirling J held that the exercise of the right of an owner of property to discharge into a public sewer conferred by section 21 of the 1875 Act could not be prevented by the local authority on the ground that the discharge was creating a nuisance. It was for the local authority to ensure that what was discharged*

into their sewer was freed from all foul matter before it flowed out into any natural watercourse."

9.5 Consequently, it is inappropriate to include a policy in the local plan requiring all development proposals to demonstrate that there is capacity for wastewater treatment and adequate wastewater conveyancing infrastructure to serve the whole development. It is agreed that there must be sufficient water capacity and wastewater infrastructure to serve new development but it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants. If the water company is unable to support the development needed in Greater Cambridgeshire, this needs to be disclosed in the Water Resource Management Plan.

9.6 In terms of wastewater treatment, Paragraph 201 of the National Planning Policy Framework (NPPF) (2024) states that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Therefore, whilst the Plan should contain policies aimed at ensuring that wastewater capacity is not put under undue pressure, planning decisions should assume that these regimes will operate effectively. As such, Part 6 (a) should be deleted from the policy.

Changes required to the plan

9.7 Part 6 (a) should be deleted from the policy.

10.0 Policy BG/UGF: Urban Greening Factor

10.1 BRC Ltd **object** to Policy BG/UGF: Urban Greening Factor. The Policy is unsound as it is not effective.

10.2 BRC Ltd consider the achievement of 10% BNG secured via the Environment Act (2021) to be an appropriate mechanism by which developments can deliver an appropriate amount of environmental and ecological enhancements. However, BRC Ltd query whether the urban greening factor has been taken into account within the Viability Assessment, with the concern that establishing a new mandatory requirement for a factor of 0.3 for predominantly commercial development and 0.4 for residential development may be both inappropriate and render development unviable (particularly when this is in addition to the other extensive environmental and sustainability requirements set out within the emerging Local Plan).

10.3 There are plentiful example Urban Greening policies adopted nationwide which apply the same UGF scores of 0.3 for commercial developments and 0.4 for residential developments as those proposed within Policy BG/UGF. However, importantly, these are expressed as targets, recognising that their achievement will be dependent upon the circumstances and constraints of individual sites. By contrast, the Regulation 19 wording requires the relevant UGF score to 'at least' achieve, effectively converting these targets into mandatory minimum requirements and removing flexibility to respond to site-specific considerations.

10.4 This concern is compounded by the requirement to demonstrate compliance using the 'latest version' of Natural England's UGF User Guide. This introduces considerable uncertainty, as the methodology against which proposals are assessed could change during the lifetime of the Plan and potentially after development proposals have been formulated. Applicants would therefore have no certainty as to the standard against which future applications will be assessed. At present this additional requirement risks rendering both commercial and residential development unviable and hence we consider the draft policy to be unjustified and inconsistent with national policy.

10.5 BRC Ltd also objects to the requirement for outline applications to be supported by a phasing strategy demonstrating that key recreational green spaces and green infrastructure will be delivered **'**early in the programme' and in advance of, or alongside, the occupation of new homes. This is overly prescriptive and fails to recognise the practical delivery and sequencing requirements of large-scale, mixed-use development.

10.6 As with many complex outline schemes, the proposals at Babraham Research Campus comprise an integrated mix of commercial and residential development, with elements of the recreational green space and permanent green infrastructure appropriately delivered as part of the later phases of the wider development. Requiring such provision to be delivered **'**early**',** a term which is itself undefined, or in advance of or alongside the occupation of the residential element, could conflict with the logical sequencing of the development and unnecessarily constrain its delivery. The timing of green infrastructure should instead be capable of responding to the agreed phasing and practical delivery of the development as a whole.

Changes required to the Plan

10.7 For the reasons provided above, Policy BG/UGF should be substantially revised or deleted from the Plan.

11.0 Policy BG/EO: Providing and enhancing open spaces

11.1 BRC Ltd **object** to Policy BG/EO. The Policy is unsound as it is not effective.

11.2 The Policy introduces an open space requirement for commercial development. Commercial developments of 2,000 sqm or more Gross Internal Area within Use Classes E(g)(i) and E(g)(ii), together with sui generis research, innovation or institutional campuses, are required to demonstrate open space provision equivalent to 2.0 hectares per 1,000 employees.

11.3 As a preliminary point, the Policy does not clarify whether the calculation is intended to be based upon the gross number of employees accommodated by the development or the net increase in employees arising from it. This distinction is important, particularly in the context of development and intensification of an established employment campus. For example assuming that the requirement is intended to apply to gross employment, the outline proposals at Babraham Research Campus provide for approximately 3,000 FTE employees, which would generate a requirement for approximately 6 hectares of open space just for employees.

11.4 Whilst Babraham Research Campus benefits from extensive historic parkland and the proposals incorporate generous areas of green open space, a requirement of this scale must be considered in the context of the wider spatial requirements of a mixed-use development. Land must also be accommodated for food growing, children's play, private and communal residential amenity space, sustainable drainage infrastructure, structural and dense planting, access and movement infrastructure, amongst other requirements. Importantly, not all of these areas would necessarily fall within the definition of open space for the purposes of the Policy. This requirement would be combined also with the accessible green space requirements for residential developments.

Changes required to the Plan

11.5 The Policy should clarify that the requirement of 3.0 hectares per 1,000 population is intended to be applied on a pro-rata basis to developments accommodating fewer than 1,000 residents. Whilst this appears to be the intention, particularly given the reference to a functional minimum parcel size of 0.5 hectares, this is not expressly stated and should be clarified to ensure consistent application of the Policy.

11.6 Furthermore, the policy should be amended to clarify whether the stated open space standards represent a requirement for new/additional open space arising from development, or whether existing accessible open space may contribute towards the required provision. As currently drafted, references to ‘total provision’ and ‘open space provision’ do not distinguish between existing and new provision. This creates uncertainty as to how the standards would be applied, particularly to development within established sites or campuses where significant existing open space may already be available and accessible.

11.7 The policy should expressly confirm that existing accessible open space within a development site may count towards the relevant quantitative standards where it is retained and remains available to serve the development. Requiring the standards to be met solely through new provision would risk generating an unjustified additional requirement irrespective of the quantity, quality and accessibility of existing open space already available within a site.

11.8 With the above in mind, it must be reiterated that the clear direction of national policy is to support economic growth whilst making effective and efficient use of land. The NPPF (2026) places significant emphasis on building a strong, effective economy and ensuring that planning policies facilitate, rather than unnecessarily constrain, investment and development, alongside the effective use of land. Against this context, the application of a generic quantitative open space standard to commercial development risks losing sight of the fundamental purpose of such development: to deliver employment floorspace, support business growth, create jobs and facilitate innovation.

11.9 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.

12.0 Policy J/AW: Affordable workspace and creative industries

12.1 BRC Ltd **object** to Policy J/AW. It is not sound as it is not justified.

12.2 While the objective of increasing affordable workspace in Greater Cambridge is supported in principle, draft Policy J/AW does not meet the soundness tests in paragraph 36 of the NPPF. It has not been shown to be positively prepared, justified, effective or consistent with national policy and should therefore be substantially revised or deleted.

12.3 Although the evidence identifies a need for affordable workspace, it does not justify the policy's most onerous requirements, including:

- 10% affordable workspace across a broad range of commercial development types;
- rental discounts of up to 30% below market rents;
- affordable provision secured in perpetuity;
- the reduction in the office and R&D threshold from circa 2,500sqm to 1,000sqm; and
- a largely uniform approach across materially different commercial markets.

12.4 Furthermore, the Iceni Affordable Workspace Study (2026), which forms part of the Evidence Base, acknowledges that comparable policies vary widely in thresholds, discounts and affordability periods, but does not explain why the Councils have selected one of the most onerous combinations. Reasonable alternatives, including higher thresholds, lower discounts, fixed-term affordability or more flexible viability-led mechanisms, do not appear to have been robustly assessed or discounted.

12.5 With regard to Babraham Research Campus, the Policy must recognise that established innovation campuses can already perform the function sought by the affordable workspace requirement as an integral part of their business model. At Babraham, the provision of incubator, start-up and scale-up accommodation is fundamental to the operation of the Campus including the current endeavours associated with Accelerate@Babraham.

12.6 The Campus provides an established ecosystem through which early-stage life science businesses can access flexible laboratory and office accommodation, shared facilities, specialist infrastructure and wider business support. The Campus provides a wide range of accommodation, enabling businesses to establish, grow and ultimately 'graduate' from incubator and start-up space into larger scale-up and conventional R&D accommodation within the wider Campus.

12.7 There is therefore a clear disconnect between the evidence base and the application of the Policy. Despite Babraham already delivering an established affordable workspace model which directly supports the objectives of the Policy, its categorisation as an established science and business park would subject new development to the more onerous 30% discount to market rents. This fails to recognise or give any credit to the significant affordable, incubator and scale-up provision already embedded within the Campus and risks imposing an additional requirement where the intended policy outcomes are already being successfully delivered. Such an approach places undue emphasis on a prescribed rental discount rather than the overall affordability and business

support offer, including flexible accommodation, shared infrastructure and specialist support, which enables businesses to establish, grow and graduate onto larger premises.

12.8 The evidence does not demonstrate that the affordable workspace obligations can be delivered without prejudicing the viability and delivery of employment development central to the Greater Cambridge economy. The Policy should therefore provide sufficient flexibility for established science and innovation campuses to demonstrate compliance through an existing or proposed campus-wide incubation, start-up and scale-up model where this delivers equivalent or greater benefits for SMEs and early-stage businesses. The focus should be on the outcomes achieved rather than requiring an additional prescribed affordable workspace product where a successful mechanism for supporting business formation and growth is already embedded within the operation of the site.

Changes required to the Plan

12.9 To address these concerns and improve NPPF compliance, the following modifications are required:

- remove the requirement for affordable workspace to be secured in perpetuity and replace it with a time-limited or viability-informed approach;
- make affordable workspace provision subject to viability assessment in all circumstances;
- review and increase the proposed 1,000sqm office and R&D threshold;
- introduce greater locational flexibility to reflect differing commercial market conditions across Greater Cambridge;
- undertake further viability testing using realistic market assumptions and testing the policy as drafted;
- undertake a comprehensive cumulative-impact assessment covering all Local Plan obligations and the emerging CIL regime; and
- incorporate review mechanisms so requirements can adapt to changing market conditions over the Plan period.

Babraham Research Campus
September 2026

BIDWELLS