POLICY I/ID (INFRASTRUCTURE AND DELIVERY)

There is an extensive policy burden within the Draft Plan, representing a significant increase compared with both the 2018 Adopted Local Plans and the 2026 NPPF (in relation to development management policies).

Whilst many of the individual policies are proposed for valid reasons and support Greater Cambridge's ambition to achieve high-quality development, their cumulative effect presents a significant risk to the deliverability of future schemes. For example, the Draft Local Plan introduces a number of new policy requirements, including:

- Net Zero Operational Carbon (CC/NZ);
- Supporting a circular economy and sustainable resource use, including a greater emphasis on retaining existing buildings, which can be complex and costly to deliver, may reduce overall floorspace, and can affect market attractiveness (CC/CE);
- Biodiversity Net Gain of 20% (BG/BN);
- Accreditation under the Building with Nature Standards (BG/GI);
- Urban Greening Factor requirements (BG/UGF);
- Provision and enhancement of open space within commercial schemes (BG/EO); and
- Affordable Workspace requirements (J/AW).

These requirements sit alongside the already high expectations for development quality within Greater Cambridge, including standards relating to public realm, landscaping, architecture, materials, public art and cycling infrastructure. Whilst these are positive and important aspects of successful development, they contribute to a higher cost base for development in Greater Cambridge than in many competing locations.

A particular concern is that many of the newly proposed policy requirements are drafted as generic obligations, with limited regard to site-specific circumstances, viability considerations or demonstrable local need. The cumulative impact of these requirements risks undermining the delivery of development, particularly during the first five to ten years of the Plan period. This issue is likely to be most acute for sites already under contract or progressing through the development pipeline, where land transactions and investment decisions could not reasonably have anticipated such a substantial increase in policy requirements (and potentially CIL liabilities).

Paragraphs 8 to 10 of Policy I/ID appropriately recognise viability as a material consideration in the planning process. However, viability can be affected not only by direct financial costs, but also by the practical operation of policy requirements. For example, mandating affordable workspace within smaller commercial schemes may present significant delivery challenges, whilst requiring the retention of existing buildings may reduce market appeal and limit the flexibility needed to meet occupier requirements.

Given the number of fixed and broadly applicable policy requirements proposed, the Plan should provide a clear mechanism for balancing policy aspirations against deliverability and viability considerations. Such flexibility is necessary to ensure that high quality, commercially attractive and sustainable development can continue to come forward, supporting Greater Cambridge's growth objectives while delivering buildings and places capable of meeting long-term market needs.

Summary

Railpen considers the Draft Local Plan’s cumulative policy burden a significant risk to development viability and delivery. New requirements include net zero carbon, circular economy measures, 20% biodiversity net gain, Building with Nature accreditation, Urban Greening Factor standards, commercial open space and affordable workspace, alongside already demanding design expectations. While individually justified, their combined cost and practical implications may undermine schemes, particularly those already in the development pipeline. Many requirements are

applied generically with insufficient regard to site circumstances, viability or need. Railpen therefore seeks greater flexibility to balance policy aspirations against deliverability, market attractiveness and long-term economic growth.

Railpen proposes the following amended wording to replace the existing text in the draft Local Plan:

Policy I/ID should be amended in several ways to address the cumulative burden identified in this text. Criteria 8 and 9 should be redrafted to state expressly that viability includes both direct financial cost and the practical and commercial deliverability of individual policy requirements, and should adopt NPPF policy DM5's grounds (a materially different development type or site characteristics, costs not accounted for in the plan-wide viability assessment, or significantly changed economic circumstances) in place of the single, high "cannot be viably developed" bar currently set. Because I/ID is the Plan's general infrastructure and delivery policy, it is the place for an explicit cumulative impact test. A new criterion should require the Councils, in assessing viability under criteria 8 and 9, to consider the combined effect of all applicable Local Plan requirements together rather than each policy's burden being tested in isolation, since no individual policy's own evidence base is positioned to capture the others stacking up on the same scheme. There should also be an insertion into the policy regarding the reasonable expectation that utility providers will undertake their statutory duty to provide required connections.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary

Railpen wishes to participate in the relevant hearing session(s) because its representations raise a number of concerns regarding the soundness, effectiveness and deliverability of policies across the Plan. These concerns relate to matters including policy justification, proportionality, flexibility, implementation and the practical implications of applying the proposed policy framework to development sites at different stages of the planning and delivery process.

Participation in the hearings would allow Railpen to explain these concerns in greater detail, respond to the Council’s evidence and clarify how particular policy requirements may operate in practice. It would also provide an opportunity to discuss potential modifications that could improve the clarity, effectiveness and deliverability of the Plan while still achieving its overarching objectives.

Given the breadth of Railpen’s representations and its direct interest in the implementation of the Plan, participation would assist the Inspector by providing a landowner and development perspective on the practical consequences of the proposed policies. Railpen therefore considers that its involvement in the relevant hearing sessions would make a useful contribution to the examination of whether the Plan has been positively prepared, is justified, effective and consistent with national policy.