BIDWELLS

Your ref: Local Plan – Regulation 19 Consultation
Our ref: GCLP – Reg 19 Rep
DD: [redacted]
E: [redacted]
Date: 25/09/2026

Greater Cambridge Shared Planning Services
Via Email

Dear Sir / Madam

GREATER CAMBRIDGE LOCAL PLAN: REGULATION 19 CONSULTATION RESPONSE

This note sets out representations in response to the Draft Cambridge Local Plan (Regulation 19) ('the Plan'), prepared on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd, who in respect of Cambridge North 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/AMC/NEC and Policy S/C/SRW respectively. It also considers the wider policies of the emerging Plan.

Representations - Draft Greater Cambridge Local Plan – Site Allocations

Policy S/C/AMC: Cambridge Areas of Major Change

Whilst we do not object to the principle of an overarching policy guiding the Areas of Major Change, we object to the proposed wording of the policy as drafted as it is unsound and unjustified for the following reasons:

Part 2 of the policy states:

"2. Additionally, development will only be permitted:

a. where it is in accordance with a comprehensive implementation plan for the area which has demonstrable support from all key landowners, or it is supported by evidence to demonstrate that the comprehensive and successful delivery of the development can still take place without this being secured;

b. where the development is based on clearly articulated and justified objectives and approach through the provision of a site-wide masterplan, strategies and/or other over-arching coordination documents;

c. in instances where the infrastructure provision is to be phased, an approved phasing strategy is in place."

Our concerns are:

- Parts A and B: Whilst the principle of coordinated development is recognised as is the importance of comprehensive planning in appropriate circumstances. The additional criteria set out in points

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a) and b) impose unnecessary and disproportionate requirements that risk undermining the deliverability, flexibility, and effectiveness of development. The policy does not acknowledge that different sites are at different stages; some yet to come forward through planning and some are already very advanced. For example, The promoters' sites at Cambridge North East (known as 'Chesterton Rail Sidings', see Appendix 1) are well ahead of other parts of the wider and new 'North East Cambridge Area of Major Change'.

- Part C: The blanket requirement for a site-wide masterplan and associated coordination documents is not proportionate in all circumstances. The policy fails to distinguish between large, complex, multi-landowner regeneration areas and sites where incremental or phased development is entirely appropriate. This approach risks over-prescription, reducing flexibility and responsiveness to market conditions and evolving delivery opportunities. The requirement for an approved phasing strategy wherever infrastructure provision is phased is unnecessarily restrictive. Requiring approval of a phasing strategy at an early stage may constrain otherwise viable schemes and introduce avoidable delay. The policy should instead focus on ensuring that infrastructure is delivered in a timely and coordinated manner, rather than mandating a specific mechanism.

The policy is considered unsound because it is far too prescriptive, insufficiently justified and is likely to undermine effective delivery of these key sites. It imposes blanket requirements for implementation plans, site-wide masterplans and phasing strategies without recognising differing site circumstances or stages of delivery.

This could duplicate work already undertaken for advanced or consented sites, such as Chesterton Rail Sidings, while unnecessarily constraining incremental development. The requirements may reduce flexibility, delay delivery and restrict the ability of schemes to respond to changing market conditions. A more proportionate approach should focus on securing coordinated development and timely infrastructure delivery, with requirements tailored to individual site circumstances.

We propose the following amended policy text:

"Additionally, development will only be permitted:

a. where it ~~is in accordance with a comprehensive implementation plan for the area which has demonstrable support from all key landowners or it is supported by evidence to demonstrate that the comprehensive and successful delivery of the development can still take place without this being secured;~~ will not prejudice the comprehensive and coordinated development of the wider area, having regard to key local strategies and frameworks

b. where the development is based on clearly articulated and justified objectives and an appropriate level of coordination ~~approach through the provision of a site wide masterplan~~, which may include strategies and/or other over-arching coordination documents;

c. in instances where the infrastructure provision is to be phased, ~~an approved phasing strategy is in place.~~ the development demonstrates that necessary infrastructure will be delivered in a timely and appropriate manner"

This alternative approach retains the Council's objective of coordinated development while ensuring that the policy remains flexible, proportionate, and deliverable. It avoids placing unreasonable obligations on individual landowners and better reflects the realities of development delivery in Cambridge and so better supports the timely and effective delivery of the Areas of Major Change.

Policy S/AMC/NEC: North East Cambridge Area of Major Change

The Cambridge North East Policy approach has changed to take account of the government's announcement, in August 2025, that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) through the Housing Infrastructure Fund ("HIF").

The result is that it will be highly unlikely that the Area Action Plan could be implemented across the North East Cambridge Area over the Plan period, and therefore the previously proposed approach would be unsound and unjustified.

In their topic paper on site allocations[1], the Council acknowledge that there is still a significant potential to make better use of the available sites, in particular land within and around Cowley Road Industrial Estate, and as such a policy framework is still necessary to coordinate this development across sites in different ownerships, and to create a cohesive district.

We do not object to the premise of a policy framework to guide development and recognise the important role the wider policy area will have for the Cambridge and UK economy.

However, as drafted the approach is unsound and unjustified. The sheer scale of the policy with 29 limbs, several of which have sub-limbs adding further requirements to development. The result is a policy which is far too long, difficult to digest as to what it seeks to achieve or how each of the components should be applied to different forms of development, and how they interrelated and interface. It sets an impossibly high policy matrix for developers and landowners to navigate.

Further, the inertia of the policy's predecessor, the NECAAP, should make the LPA well aware of the difficulties of co-ordinating so many different interests and the brake it imposes on creativity and deliverability at crucial stages in the economic cycle. This also flows into the aspirations of the above Policy S/C/AMC.

Such a policy, across such a large and varied area, should just identify the opportunity and provide a light touch overview of requirements and expectations of the allocation.

It is our view that the policy should be fundamentally rewritten entirely to make it succinct and usable, guided by the indicative spatial framework (figure 38 in the Local Plan). Though it should be made clear that figure 38 is intended as illustrative and is not a prescriptive tool.

However, as drafted we have the following comments to make:

- 1b. The sub-limb needs to refer to storage and distribution.
- 1c. Should be removed entirely, it is the premise of good design which is addressed in other development management policies in the emerging plan.
- 1d. Requires rewording to be clear that the enhancements should only be required where they are identified as mitigation required to make an application acceptable in planning terms, consistent with the tests of a planning condition or obligation.
- 4. The opening sentence needs to be clear that 'industrial' is also acceptable. The first paragraph could also refer to the indicative spatial framework plan too (figure 38). The sub-limbs also do not add to the policy and should be removed entirely. Sub-limb g. is also unlikely to be legally sound as it would not meet the CIL regulations test, and there is case law to this effect.
- Paragraphs 8 – 29 for the most part just repeat existing development management policies and should be removed entirely. If elements are retained, they must be far more succinct and remove repetition.

[1] Topic cover - Development Strategy Topic

- Elements of policy are far too onerous. For instance, 26 requiring all major development to be supported by detailed masterplanning and phasing strategies. This is unnecessary, and each proposal needs to be judged on its merits at the time it comes forward.

It is our view that the policy is unsound and unjustified as drafted. The Policy is overwhelmingly long and difficult to unpick each and every component and how they stitch together, as such it requires a comprehensive redraft to reduce it down to the critical matters which should guide development over time, whilst also ensuring it remains sufficiently flexible to adapt to the market over time.

Any policy should also be clear that whilst it covers the entirety of the North East Cambridge area, the policy will be applied appropriately to recognise that occupiers and landowners will not be able to adhere to many of the site wide assessment and strategies, especially the timing of them. The policy is to support and foster the important role of North East Cambridge, and to allow appropriate development to come forward.

Policy S/C/SRW: Station Road West

Uses

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 acknowledged that the previous planning permission(s) 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, even as an approximate figure. 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 a 200-metre 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 2026 NPPF, 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, hotel, medical facilities (for which there is demand) and residential.

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. Further, there may be a negative impact which needs to be weighed in the planning balance.

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 it to be considered in the planning balance.

We welcome the including of 1e. that clarifies development does not preclude future redevelopment of the train station, facilities and supporting infrastructure.

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.

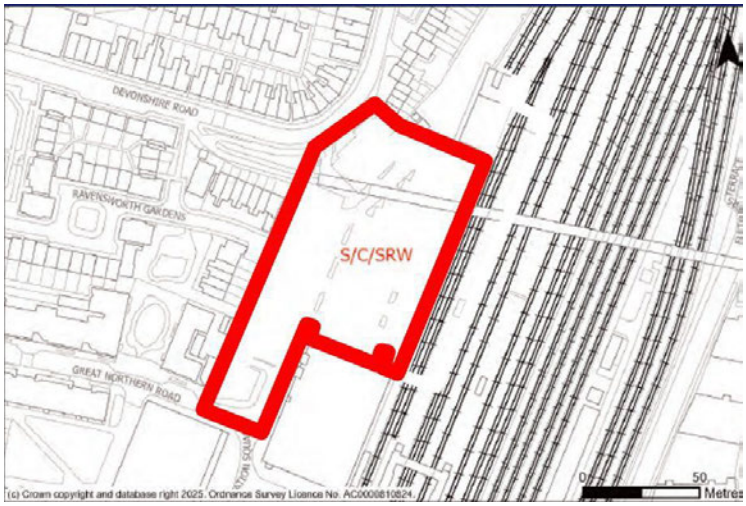


Figure 1. Proposed Amendment to Site Location Plan for Station Road West

Action Required

As set out, we remain supportive of the overall principle of the draft allocation. However, we believe that the above changes are required to ensure that the policy is sound, justified and consistent with national policy.

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 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 that technology brings. Over the life-time 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. Including the commitment to the Development Corporation. Further, the Mayor's Local Growth Plan[2] seeks to triple the Cambridgeshire and Peterborough Local Economy by 2050.

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 utilise a more optimistic and realistic figure for job numbers and include explicit support for higher-growth scenarios, with corresponding flexibility in employment land

[2] C220817 CPCA Prospectus

allocations. Without these changes, Policy S/JH risks being unsound and inconsistent with national policy objectives to support sustainable economic growth and productivity; it will also fail to support the economic priority placed on Cambridge through the Development Corporation, and the Mayor's ambition to triple the economy by 2050.

Action Required

The Local Plan needs to base its strategic policies upon a high job growth and associated housing growth beyond the minimum position. This would better align it with the economic priorities of the government, Development Corporation and the Mayor.

General Development Management Policy Comments

Policy J/AW: Affordable Workspace

Whilst the objectives of supporting start-up businesses, SME's and the creative sector are understood, concerns remain regarding the evidential basis for key elements of Policy J/AW, particularly the in-perpetuity requirement, the proposed reduction in the office and R&D threshold to 1,000 sq m and the cumulative impact of the policy when considered alongside the wider requirements of the Draft Local Plan.

The Affordable Workspace Study demonstrates a need for additional affordable workspace provision but provides limited justification as to why a 1,000 sq m threshold has been selected in preference to alternative thresholds previously consulted upon.

More flexibility is needed within the policy in order that it can respond to fluctuating market conditions. The in-perpetuity requirement should be revisited to allow for the duration to be considered on a case-by-case basis.

Fundamentally, the policy introduces a significant additional burden on commercial development in a market that is already expected to absorb a wide range of infrastructure, sustainability and place-making requirements. There is no clear evidence to demonstrate that the Council has looked at the cumulative impact of these requirements on top of pending CIL charges, to determine whether commercial development viability would be significantly impaired.

Further, we have concerns regarding the robustness of the Local Plan Viability Assessment (LPVA) July 2026. For instance, we believe that the costs assumptions underpinning the assessment are towards the bottom end of the scale, whilst rental values are towards the top end. This creates an overly optimistic position that is not likely to be achieved across the Plan area.

For example, in terms of gross development value (GDV), the LPVA applies a single Laboratory (Fringe) rent of £70.00 per sq ft across every typology it tests, regardless of location. That figure sits at or above the strongest rents being achieved in Greater Cambridge's established science park locations. By way of comparison, a 31,000 sq ft shell and core lab letting at the Orion Building, Unity Campus – one of the science parks specifically named in Policy J/AW as qualifying for the higher discount tier (Policy J/AW, criterion 1a and para 8.40) – was agreed at £44.00 per sq ft, over a third below the LPVA's assumed rate.

If a rate close to the top of the market is not reliably being achieved even at one of the policy's own named premium locations, applying that same premium figure uniformly across the wider area risks materially overstating the viability position on which the policy relies.

Similarly, prime yields of 5.25% have been adopted in respect of all Laboratory accommodation. In our view, such a yield could be achievable in certain prime locations. However, not in all. We do not consider

it reasonable to apply prime yields on a blanket basis, across the entire Plan area, without adjustment for location.

It should be noted that Bidwells submitted representations to the proposed Greater Cambridge Draft CIL Charging Schedule during the consultation period in March 2026. As part of these representations, Bidwells submitted a Viability Technical Note on behalf of multiple clients, which critiqued the CIL Viability Assessment (the "CIL VA") undertaken by Quintic Advisory.

Our Viability Technical Note included commentary on the various commercial markets also considered in the AV LPVA, including office and laboratory rents and yields. This commentary is highly relevant for the purposes of this Local Plan representation also.

It is material to highlight that the Councils have commissioned two separate area-wide viability assessments from two different consultants at a similar time – the Quintic CIL VA dated January 2026, and the AV LPVA dated July 2026, for two different policy purposes. Having reviewed both assessments, we note that there are numerous instances where different cost and value assumptions have been made by both consultants, whereas we would expect there to be more consistency. No reason for the different viability assumptions has been provided.

Given the material impact of both the introduction of CIL and Policy J/AW, these differences should be explained.

There remains a significant risk that the policy could discourage or constrain the delivery employment floorspace, particularly on smaller and medium-sized schemes, thereby undermining the competitiveness of Greater Cambridge as a location for business investment and growth. This is contrary to the ambition the government and Mayor have for Cambridge.

In the absence of more robust evidence demonstrating that the policy can be accommodated without affecting delivery, Policy J/AW is not considered to be sound and fails to strike an appropriate balance between securing affordable workspace and maintaining the viability and deliverability of the employment development needed to support the Local Plan's growth strategy.

In summary, whilst we do not object to premise of delivering affordable workspace and acknowledge the benefits that such a policy could bring, we conclude that the draft policy requires more robust evidence to demonstrate its acceptability, and beyond that requires revisions in order that it can be justified, effective and consistent with national planning policy.

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 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 North East Cambridge and Station Road West, including the Chesterton Siding site specifically. This is shown in figure 2 below, this extends much further into the Cambridge North area than it did at Regulation 18 stage.

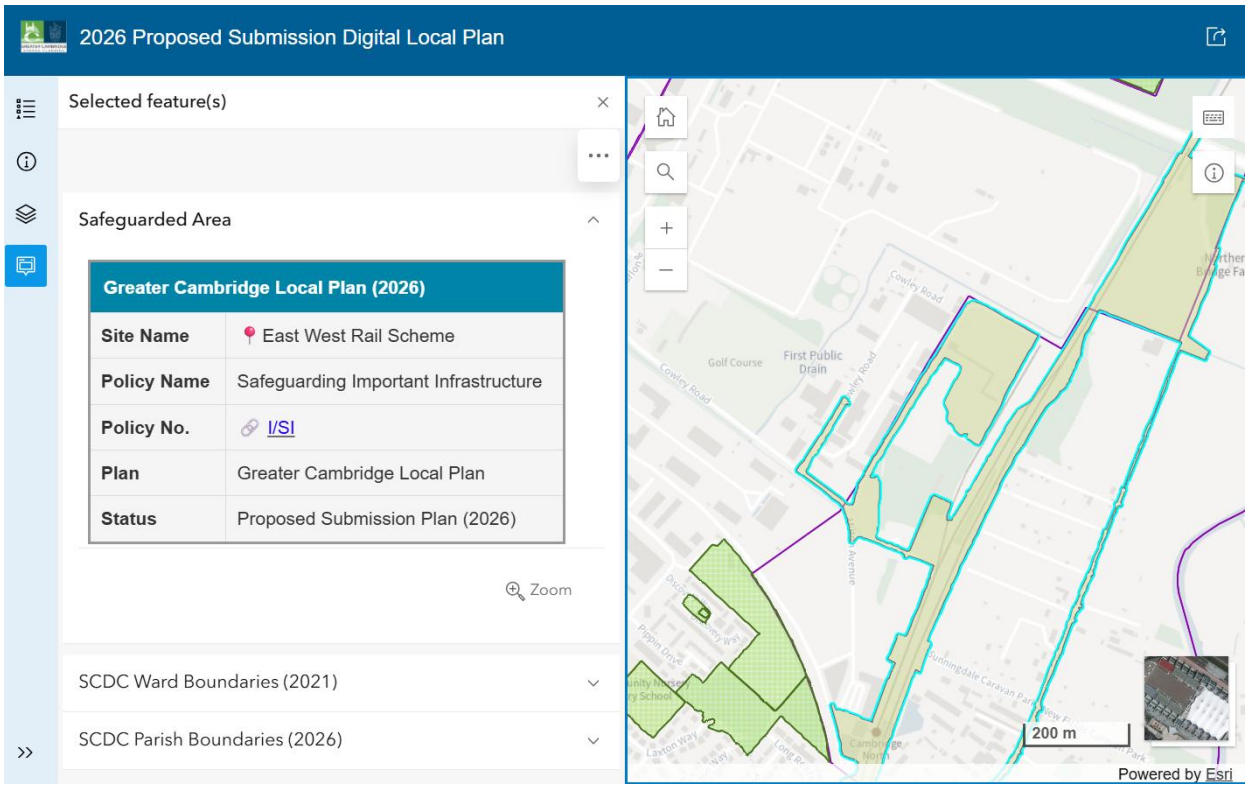


Figure 2 – EWR Safeguarded Area at North East Cambridge taken from draft policies map.

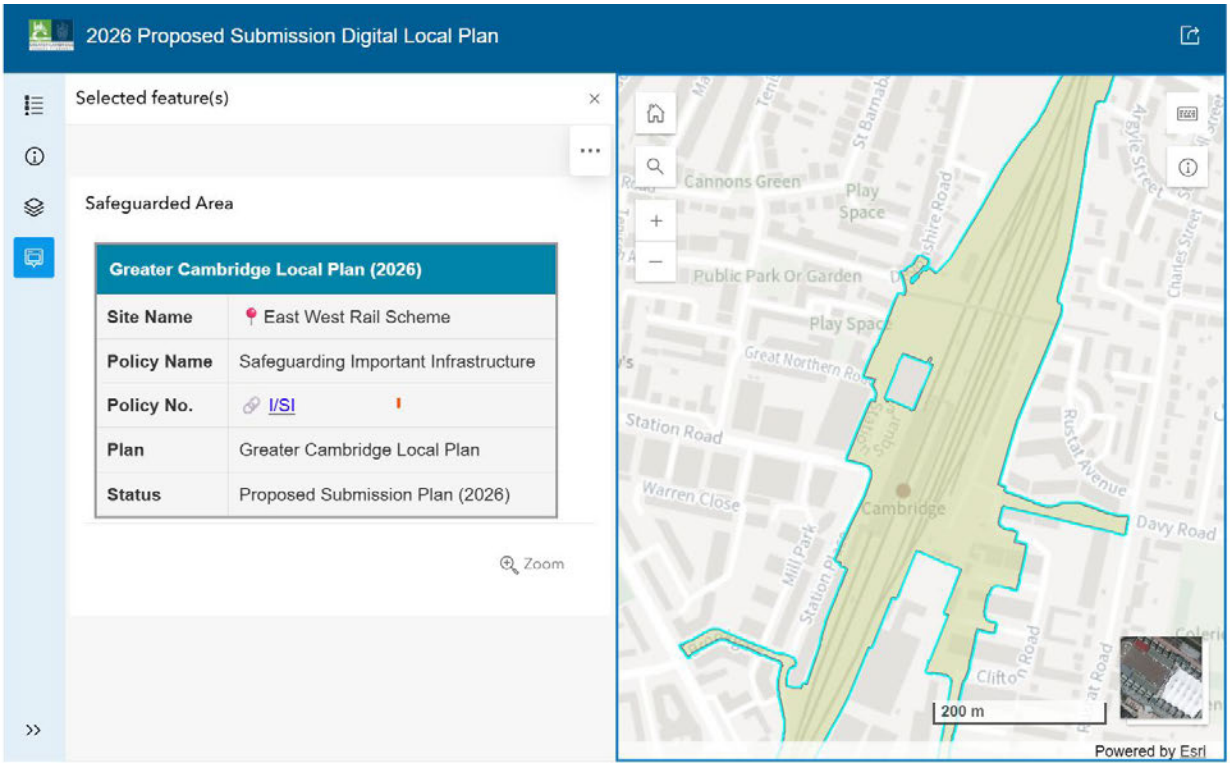


Figure 3 – EWR Safeguarded Area at Station Road West taken from draft policies map.

It is acknowledged that the safeguarding area identified in figures 2 and 3 has been established by EWR 2026 consultation 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. Brookgate and Network Rail remain in active discussions with EWR to resolve conflicts between the ongoing development proposals and the 'proposed' safeguarding areas, which we believe are unlikely to reflect the final position.

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. We welcome that the policy has been re-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.

General Development Management Policy Comments

There are several development management policies within the Plan which seek to exceed other consenting regimes requirements, thereby adding onerous requirements onto development which is unsound and unjustified.

The NPPF 2026 whilst not the examining plan at Annex A, paragraph 2 effectively requires a consistency check between Local Plan policies and the National Development Management Policies of the Framework. Where materially inconsistent, Local Plan policies will carry very limited weight, and weight applied to the Framework instead.

The Council needs to ensure that development management policies are consistent at this stage, and we have found no record of such an exercise being carried out as part of this process, and the transitional arrangement of Annex A, paragraph 2 would seemingly not apply to these policies as they have not been examined and adopted against the 2026 Framework. Therefore, Policy DM7 of the 2026 Framework would apply where the Council is seeking to exceed matters controlled by other statutory regimes.

Whilst supportive of the premise of many of these conditions, ensuring consistency with other consenting regimes is important for investor confidence; or where standards are exceeded it is clearly evidenced as to why and its viability. This follows on from the concerns we have with the Local Plan evidence base as discussed under the affordable workspace policy.

We are concerned that this is the case for the following policies:

- Policy BG/BG: Biodiversity and geodiversity;
- Policy CC/DC: Designing for a changing climate;
- Policy CC/NZ: Net zero carbon new buildings;
- Policy CC/WE: Water efficiency in new developments;
- Heritage related policies.

We also believe there are other policies which the premise of are not unacceptable, but their detailed wording is not sound. For instance:

- **Policy WS/NC**: Meeting the needs of new and growing communities – the requirement for commercial development over 5,000sqm to provide a detailed assessment of sport, recreation, culture and community needs, and strategies to address those needs is not considered to be appropriate, particularly at the scale the Council sets out. Jobs and employment in general do not add significant burden to these matters in the same way residential proposals may do. Whilst it is accepted much larger employment sites or areas can comprehensively masterplan these in, the threshold set cannot achieve that and just creates further financial burden upon developments.
- **Policy WS/IO**: Creating inclusive employment and business opportunities through new developments – the premise of supporting skills and training is acceptable. However, as drafted the policy is too restrictive. For example, limb 4. Saying 20% of all construction jobs 'must' be for local residents. That lacks sufficient flexibility to be sound and is not justified. If such a work force is not available then it automatically means a policy conflict, where a developer, through no fault of their own, not be able to secure local employment.
- **Policy BG/UGF**: Urban Greening Factor – As drafted the policy lacks sufficient flexibility requiring development to comply with the scores as set out in paragraph 1. This fails to recognise different typologies of commercial development, ie: industrial and logistics where service yards necessarily have to be free of landscaping. We suggest, similarly to the London Plan, there needs to be sufficient flexibility to say 'should' meet certain scores unless justified through evidence.
- **Policy BG/EO**: Providing and enhancing open space – still requires commercial development of 2,000sqm and above to provide public open space on site. This is a significant requirement and again fails to fully understand different typologies ie: E(g)(ii) may be in a warehouse development for a mid-

tech user. Large areas of open space on warehouse schemes will result in a significant land take which will run contrary to the government's requirement for efficient use of land. For commercial schemes this should just be judged on a case-by-case basis.

Summary

For the reasons set out above, we have concerns that the Plan as drafted is not sound, justified or consistent with national policy.

Our note has set out our concerns with the Plan, and we reserve the right to participate in the Examination process, through Matters, Issues and Questions or the hearing sessions.

Should you wish to discuss the above, please do let me know.

Kind regards,



Gareth Pritchard
Partner