BIDWELLS

Your ref:
Our ref:
DD: [redacted]
E: [redacted]
Date: 24/09/2026

Greater Cambridge Shared Planning Policy Team
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge CB23 6EA

Dear Planning Policy,

PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN 2024 – 2045

REGULATION 19 CONSULTATION SEPTEMBER 2026

LAND TO THE NORTH OF STATION ROAD, CAMBRIDGE

These representations have been prepared by Bidwells LLP on behalf of Jesus College in response to the Regulation 19 Consultation of the Proposed Submission Greater Cambridge Local Plan ('GCLP'). These representations relate to Land to the north of Station Road, Cambridge ("the Site") which is within the ownership of Jesus College. Please refer to **Appendix 1** for site location plan.

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.*

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

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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).

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).

These representations follow those previously submitted to the First Proposals Regulation 18 consultation. Through the Council's Housing and Economic Land Availability Assessment (HELAA) (2026), the Site is given a reference of 115685. The earlier submissions made by Jesus College 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 relevant policies relating to the wider Development Strategy proposed in the Plan.

The remainder of this letter is set out as follows:

- Site Description
- Development Proposals
- Response to the Proposed Submission Greater Cambridge Local Plan (GCLP)

The Site

The site is to the north side of Station Road, Cambridge and stretches from the Hills Road/Station Road junction eastward to Tenison Road. The site is composed of eleven buildings, comprising 1 - 4 Arundel Villas (semi-detached), St Andrews (detached) and 1 – 6 Salisbury Villas (detached). In these representations, they are all collectively referred to as the 'Salisbury Villas', for simplicity. The villas are currently in Use Class E(g) (i) (office) and Use Class D1 (language school).

The Salisbury Villas are set back approximately 16m from Station Road and, what would have originally been separate front gardens, have been joined together to form a second access road, parallel to Station Road, with parking behind a row of mature lime trees. To their rear, the Salisbury Villas all have deep plots.

The Site can be accessed from Station Road and the junction of Station Road and Tenison Road.

The Site is surrounded by office development to the east and south, as part of the 'Area of Major Change' to the Station Area, and residential properties lie to the north. No.s 55-59 Hills Road and No.s 1-7 Station Road (also within the ownership of Jesus College) lie to the west and are in retail use.

The Site is located within the New Town and Glisson Road Common Conservation Area.

None of the buildings within the Site are listed, however they are all identified as 'Buildings of Local Interest' (51-53 Hills Road and the Station Mews are excluded from this list). In addition, they are identified as 'Buildings of Positive Townscape Value' in the New Town and Glisson Road Conservation Area Character Appraisal (2012), (51-53 Hills Road and the Station Mews are excluded from this list). As such, the existing buildings are considered to be "non-designated heritage assets".

Development Proposal

The vision remains the same as that presented in previous representations to the Local Plan, namely;

> *'to breathe new life into the Site, continuing the successful transformation of this part of the city and to provide additional capacity to support the clustering in the local area, which has proven so important to Cambridge's economy'.*

In order to guide the future development of the site, the College has developed four core objectives:

- Supporting a sustainable Cambridge by making appropriate and efficient use of a site in a highly accessible location;
- Spearheading solutions to move to a net zero-carbon society in the context of the climate emergency in this highly sustainable and accessible location;
- Delivering a lasting legacy of high-quality architecture with a distinctive character to create a unique sense of place as part of the College's long-term endowment portfolio;
- Enhancing the green space and public realm at this important gateway into the city centre.

The College is still at an early stage in developing their emerging masterplan and are keen to engage with the Council, stakeholders and the local community to refine and discuss the proposals further as part of the ongoing consultation on the emerging Greater Cambridge Local Plan to determine which balance of issues, in the face of changing planning and climate priorities, informs what is the most appropriate long-term future for the site.

Response to the Proposed Submission Greater Cambridge Local Plan (GCLP)

Policy S/JH : New Jobs and homes

Jesus College **object** to Policy S/JH. The policy is unsound as it is not positively prepared, not justified, not effective and inconsistent with national policy.

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.

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.

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.

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.

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'.

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.

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.

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

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.

Policy S/DS: Development Strategy

Jesus College **object** to Policy S/DS: Development Strategy. The policy is unsound as it is not consistent with national policy.

As referred to in representations to Policy S/JH, the identified needs in the Plan are considered too conservative and do not reflect the growth agenda in national, regional and local contexts mandated by the incumbent Labour Government. 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. Collectively, it remains apparent therefore that the Government have a continued agenda to deliver high levels of growth within Greater Cambridge and as such more optimistic and realistic figures for job and housing numbers are needed to support sustainable economic growth and productivity.

Furthermore, the development strategy relies too heavily on large allocations which in turn risks a lack of delivery in the first 10 years of the Plan due to the significant infrastructure required to service the very large allocations. This problem is highlighted in paragraph 2.76 of the Plan where the text acknowledges that it must '*ensure a deliverable plan but which is reliant on a significant level of infrastructure'*. Senior Councillors at Cabinet have also expressed their concerns to officers that this strategy is a risky one to adopt.

In particular, the Plan relies on two very large allocations set out under 2(c) i Cambourne North (2550 dwellings in plan period) and 2(c) ii Grange Farm (2550 dwellings in the plan period) which relies on significant infrastructure (namely Cambourne Railway Station to be delivered as part of East West Rail and CSET respectively) coming forward in a timely manner to service these two large strategic sites. Further ambiguity is compounded at paragraph 2.80 of the Plan to the strategy as the Cambridge Wastewater Treatment Works still makes an appearance as a potential development site even though Government funding for the project has been cancelled by Government.

Changes required to the plan

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.

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

Jesus College **object** to Policy CC/IW. The policy is unsound as it is not justified.

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. Jesus College 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.

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."*

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."*

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.

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

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

Policy J/AW: Affordable workspace and creative industries

Jesus College **object** to Policy J/AW. It is not sound as it is not positively prepared, justified, effective or consistent with national policy.

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. This objection should be read with the accompanying Bidwells Viability Representation, which identifies significant shortcomings in the Councils' evidence base.

Assessment of Whether the Policy is Justified

Paragraph 36 of the NPPF (2024) requires Local Plans to be justified, meaning they must represent an appropriate strategy, consider reasonable alternatives and be based on proportionate evidence.

The Councils have not demonstrated that Policy J/AW is the most appropriate strategy for increasing the amount of commercial floorspace affordable and available.

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.

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.

The Affordable Workspace Study relies heavily on London comparators, including Southwark, Brent, Waltham Forest and Wandsworth, and the draft policy appears consistent with Lambeth and Westminster approaches. This is flawed because London's market, economic and geographic conditions

differ significantly from Greater Cambridge, particularly South Cambridgeshire's dispersed, rural and science-park-led economy. Oxford, the only non-London reference point, concerns Community Employment and Procurement Plans rather than affordable workspace. The read-across to Greater Cambridge has therefore not been adequately evidenced.

Oxford City Council's Regulation 19 Proposed Submission Local Plan includes draft Policy E4 (Affordable Workspaces), which requires:

- development proposals delivering a net gain of 5,000sqm GIA of employment uses (E-Class) to produce an affordable workspace strategy for specified sites; and
- the strategy to set out the details, size, marketing, servicing, management and delivery of the space.

Oxford's approach is more flexible and site-specific, enabling affordable workspace where justified by need and deliverability. Given Oxford's strong R&D sector and similar affordability pressures for SMEs, it is more comparable to Greater Cambridge than the London examples. A more justified approach would therefore align more closely with Oxford's emerging policy.

We acknowledge Oxford's emerging Local Plan has not been examined yet and hence the policy has not yet been demonstrated to be sound yet. Nonetheless we contend this indicates a flexible, market led approach in a comparable context to Greater Cambridge, facing similar issues with regards to University spin outs, SME's and supply and demand of commercial floorspace.

The in-perpetuity requirement is unjustified. The evidence recognises that comparable policies often use fixed periods yet gives no compelling reason for a permanent restriction in Greater Cambridge. A perpetual discount permanently suppresses rental income and investment value, unlike a time-limited obligation. Lambeth's policy, for example, expires after 15 years.

The basis for reducing the office and R&D threshold to 1,000sqm is unclear. The evidence relies substantially on London benchmarking, which does not reflect Greater Cambridge's dispersed science park, innovation campus and rural employment locations. The threshold therefore lacks a robust local evidential basis.

We also raise concern that the 1,000sqm threshold is arbitrary and risks creating a cliff-edge for development required to provide affordable workspace. We recommend a transitional and graduated approach should be introduced rather than a square cut off at 1,000sqm which may discourage developers from pursuing schemes which may trigger the 1,000sqm threshold but do not benefit from the economies of scale large and strategic schemes do which may be better placed to absorb affordable workspace requirements.

Policy J/AW has therefore not been shown to represent the most appropriate strategy or to be supported by proportionate evidence. It is not justified under paragraph 36 of the NPPF (2024).

Assessment of Whether the Policy is Effective

Paragraph 36 of the NPPF (2024) requires Local Plan policies to be effective and deliverable over the plan period.

The Councils have not shown that Policy J/AW can be delivered without harming the employment development needed to support Greater Cambridge's growth ambitions.

Policy J/AW would also sit alongside biodiversity net gain, net-zero carbon requirements, transport mitigation, open space, green infrastructure, Section 106 contributions and the emerging Community Infrastructure Levy regime.

Although some requirements have been assessed individually, the evidence does not convincingly demonstrate that commercial development can absorb the cumulative cost of Local Plan and regulatory obligations across the Plan area.

This is particularly important in current market conditions. Greater Cambridge's office, laboratory and life sciences sectors are undergoing market adjustment, as set out in the Viability Representation prepared by Bidwells. The Councils' evidence acknowledges changing occupier demand, increased laboratory vacancy, financing pressures and economic uncertainty. In this context, any policy that permanently reduces investment returns risks suppressing development activity and undermining delivery.

The viability representation identifies substantial concerns with the Local Plan Viability Assessment, including assumptions on rents, yields, benchmark land values, build costs, developer return and brownfield redevelopment costs. These concerns call into question the robustness of the viability and deliverability conclusions.

The Councils have therefore not shown that the policy will be deliverable across the commercial schemes to which it would apply. There remains a significant risk that it will reduce delivery of office, R&D, laboratory and industrial floorspace during the Plan period.

It should be noted that this requirement is being introduced at the same time as Employment and Skills Plans which we support. We consider this mechanism to be an effective, meaningful way to help individuals in the employment market. In comparison we query the overall effectiveness of affordable workspace provisions on individuals in the job market.

As drafted, the policy risks threatening commercial viability and reducing investment in Greater Cambridge. Contrary to its aim, it could reduce overall affordable workspace provision. The policy is therefore not effective.

Assessment of Whether the Policy is Consistent with National Policy

Chapter 6 of the NPPF (2024) promotes a strong, competitive economy. Paragraph 85 requires planning policies to give significant weight to economic growth and to maintain conditions for investment and sustainable development.

The NPPF also makes clear that planning policies should not undermine viability or impose burdens that threaten delivery.

Policy J/AW is inflexible and does not adequately respond to changing market conditions. Its affordable workspace requirement, discount levels and affordability period are fixed, with viability considerations focused mainly on payment in lieu rather than the principle of provision. This rigidity is inconsistent with the NPPF's emphasis on delivery, flexibility and maintaining viability.

The Councils have not justified why an in-perpetuity requirement is necessary, or why the policy should apply unchanged regardless of future economic, occupational or investment conditions. Commercial markets fluctuate, and policy must be able to respond.

Without robust evidence that the requirements can be absorbed without harming delivery, the policy is not consistent with national objectives for economic growth, productivity and investment.

Assessment of Whether the Policy has been Positively Prepared

The Local Plan must be positively prepared and provide a strategy capable of meeting identified needs, in accordance with paragraph 36a of the NPPF.

Greater Cambridge's economic success depends on continued employment floorspace delivery and its global strength in life sciences, R&D, biomedical and IT sectors. The growth strategy relies on offices, laboratories, innovation space and industrial accommodation across a range of locations.

Although Policy J/AW seeks to address affordable workspace need, it risks undermining the wider commercial floorspace delivery on which economic growth depends, given the concerns in the Viability Representation. Additional obligations may reduce investment, delay delivery and discourage employment-land redevelopment, particularly on constrained brownfield sites affected by contamination and remediation costs.

If the policy reduces overall commercial development delivery, it would frustrate rather than support the Plan's wider economic objectives and cannot reasonably be regarded as positively prepared.

Changes Required

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.

For the reasons above, and having regard to the accompanying viability evidence, Policy J/AW has not been shown to be positively prepared, justified, effective or consistent with national policy as required by paragraph 36 of the NPPF. 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 be significantly modified or deleted.

Policy BG/BG: Biodiversity and geodiversity

Comments

Jesus College supports the objective of enhancing biodiversity; however, objects to Criterion 2 due to its requirements exceeding the nationally mandated 10% requirement, lack of sufficient flexibility and likelihood of adversely affecting the viability and deliverability of development. An overly prescriptive numerical approach to planning assessments erodes the ability to undertake a planning balance and ensure that a scheme is designed in the round as most appropriate for that development in that context.

Criterion 2 states that all major development must deliver a minimum of 20% biodiversity net gain (BNG) to be provided on-site where feasible, or off-site only where onsite opportunities have been evidenced to be exhausted. This requirement exceeds the nationally mandatory position of 10% BNG requirement and has not been sufficiently justified.

This blanket requirement for 20% BNG fails to account for sites that are located on constrained site where opportunities for on-site BNG provision may be limited. As drafted, the policy provides insufficient flexibility to account for these site specific constraints. Requiring a minimum of 20% BNG in all circumstances is therefore overly prescriptive and risks imposing additional costs that could affect viability and deliverability of development.

The policy should therefore be amended to align with national mandatory requirements of 10% BNG. The requirement should therefore be amended so that applicants can be "*encouraged"* to achieve the 20% target, rather than "*must"* achieve it. This approach ensure the policy remains aligned with national requirements whilst being effective and deliverable.

Changes Required

Policy BG/BG should be amended to align with national mandatory requirements of 10% BNG. The requirement should therefore be amended so that applicants can be "*encouraged"* to achieve the 20% target, rather than "*must"* achieve it. This approach ensure the policy remains aligned with national requirements whilst being effective and deliverable.

Policy BG/UGF: Urban Greening Factor

Comments

Jesus College supports the objectives of this policy but objects to its current wording. There is an inherent policy contradiction within Policy BG/UGF which notes in part 1 that 'all policies must include the latest version of....', whilst the supporting information at Paragraph 5.46 states that 'Major development proposals should contribute to the greening of Greater Cambridge by including urban greening' (emphasis added). An objection is made to the use of 'must' within the policy wording and respectfully request that the Inspector amend this to 'should' in order to accord with the supporting text. An overly prescriptive numerical approach to planning assessments erodes the ability to undertake a planning balance and ensure that a scheme is designed in the round as most appropriate for that development in that context.

The policy also fails to reflect site specific circumstances through the omission of a viability clause, which is required to ensure that sustainable development is always possible in the right locations. The policy should encourage developers to achieve the identified standards whilst taking account of site-specific circumstances, technical feasibility and viability considerations.

Jesus College therefore recommend that Policy BG/UGF is amended to state that 'all policies should include the latest version of...' and a viability clause is added such as 'Where it can be demonstrated that achieving the target UGF score is not financially viable or technically feasible, a lower score may be accepted.'

Changes required

Policy BG/UGF should be amended to state that 'all policies should include the latest version of...' and a viability clause is added such as 'Where it can be demonstrated that achieving the target UGF score is not financially viable or technically feasible, a lower score may be accepted.'

Policy BG/EO: Providing and enhancing open spaces

Comments

Jesus College principally supports the objective of providing and enhancing open space. However, it objects to the policy as drafted as it fails to adequately recognise the specific characteristics of commercial development across Greater Cambridge.

Criterion 4 requires all commercial developments exceeding 2,000 sqm GIA to provide open space equivalent to 2.0 hectares per 1,000 employees. This requirement is overly prescriptive and risks undermining the efficient use of employment land. The 2,000 sqm threshold is low, and the blanket requirement for 20 sqm of open space per employee is unlikely to be appropriate across all development types and locations. In particular, schemes in more constrained and urban locations may struggle to meet the requirement without comprising the efficient use of land, creating an efficient layout and achieving development viability.

For example, the policy does not sufficiently recognise the range of open space solutions that may be appropriate in commercial environments including roof terraces, roof gardens, courtyards and other forms of amenity space that can contribute to employee wellbeing and reduce any demand arising to existing public opens from the occupation of new commercial floorspace.

The policy also provides limited clarity on how the requirement would apply to phased developments or future phases within larger employment campuses. This creates uncertainty for applicants and makes site planning, masterplanning and viability assessments more challenging.

The cumulative effect of these requirements risks placing an unnecessary burden on commercial development, contrary to the objective of supporting sustainable economic growth across Greater Cambridge.

Changes required

Criterion 4 of Policy BG/EO should be amended as follows:

All commercial developments for 2,000 square metres or more (Gross Internal Area) within Use Classes E(g)(i), E(g)(ii), as well as sui generis uses where the proposal comprises a research, innovation or institutional campus, must:

a. Demonstrate open space provision equivalent to 2.0 hectares of open space per 1,000 employees; ~~and~~/or;
b. Where site constraints or urban location render point a unfeasible and undeliverable, provide delivery of roof terraces, roof gardens, courtyards and other forms of amenity space at an appropriate scale to the development
c. Where justified and agreed with the LPA, make this provision off-site via financial contributions, with a focus on contributions to local greenspaces likely to be impacted by visits by on-site employees following occupation.

Policy WS/NC: Meeting the needs of growing communities

Comments

Jesus College objects to Policy WS/NC as drafted on the grounds that it places disproportionate obligations on commercial development, lacks certainty regarding the scale of infrastructure requirements, and will likely adversely affect development viability and deliverability of commercial developments to come forward.

Criterion 2 requires employment development of more than 5,000sqm to be informed by detailed assessments of community needs and strategies to address those needs. The policy provides insufficient certainty regarding the extent and scale of contributions that may be required, making it difficult to

accurately assess development costs, viability and deliverability of development proposals. This represents a particular challenge when deciding to enter into the planning process; planning policy should give a high degree of certainty to assess a site pre-planning.

Criterion 6 is particularly onerous in requiring contributions towards community and cultural facilities based on prescribed floorspace standards, alongside the submission of Community and Cultural Plans. The policy fails to recognise existing community, cultural and recreational facilities already provided with many commercial and employment developments. Furthermore, it does not adequately justify why commercial proposals should be expected to deliver such significant social infrastructure. Employees do not generate demand for local community and cultural facilities in the same way as residential developments.

Criterion 7 and 9 similarly place unreasonable expectation on commercial developments to provide or contribute toward sports and recreational facilities. The policy does not adequately account for existing provision or whether a development proposal would generate a demonstrable need for additional facilities. Any requirement for on-site provision or financial contributions should be evidence-based, proportionate and directly related to the impacts arising from the development.

Criterion 11 requires services and facilities to be delivered during the "early phases" of development. This lacks clarity and provides limited certainty for the timing as to when infrastructure and facilities would be expected to come forward. To ensure the policy remains flexible, it is recommended that the policy should allow the timing of delivery to be determined on a case-by-case basis, taking into account the scale and phasing of the development.

Changes required

Proposed changes to the policy text are outlined in the attached letter, including an additional clause to Crieterion 1, stating ‘where there is a demonstrable need, and it is viable and deliverable to do so.’

Deletion of crieterion 6 and 9 is proposed.

Reference in criterion 11 to assessing phasing of delivery on a casr-by-case basis is proposed.

Identifying and addressing needs

1. New development will be required to include or contribute to the delivery of the services and facilities necessary to meet the needs of the development and mitigate the impact of development on existing local facilities where there is a demonstrable need, and it is viable and deliverable to do so.
2. The scale and range of facility and service provision or contribution must be appropriate to the level of need (including the specific needs of different demographic groups) generated by the development, and it must be adaptable to population growth and demographic changes. In making assessments of need and the timing of delivery of the facility or service, regard must be had to:
    a. The capacity, quality, and accessibility of existing facilities in the locality; and
    b. Any local strategies recognised by the Local Planning Authorities that seek to improve public health, indoor sports & recreation, social and cultural wellbeing, and the sustainability of communities.
3. Development of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in delivering the facilities off site. Acceptable provision and arrangements will be determined in consultation with service providers.

4. Proposals for residential sites of 200 or more dwellings (or groups of smaller sites which cumulatively exceed this figure) and employment development of over 5,000 square metres must be informed by detailed assessments of both sports, recreation, culture and community needs, and include strategies that address identified needs. Submitted strategies to meet community and cultural needs must demonstrate that the local community and stakeholders have been engaged to guide the provision of community facilities to be introduced as part of the site-wide development strategy. Measures may be required to assist the development of a new community, such as through community development workers.

Indoor and outdoor community and cultural facilities

5. All residential development will contribute towards the provision of indoor and outdoor community and cultural facilities to meet the needs generated by the development. Development of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in off-site delivery. Other developments will contribute to off-site provision through planning obligations or through a Community Infrastructure Levy (CIL) as appropriate.
6. ~~Contributions for community facilities will be based on a standard of 129 square metres of such floorspace per 1,000 additional population. Contributions for cultural facilities will be 100 square metres per 1,000 additional population and 1.5% of Net Internal Area commercial space. This is based upon a combination of the Arts Council England benchmark and Museums, Libraries and Archives (MLA) Standard applied to the local context (using the Department for Culture, Media and Sport Participation Survey). For all applicable proposals, Community and Cultural Plans will form part of the planning submission process, and these must demonstrate a robust, evidence led and locally responsive approach for their provision and long-term viability. All plans should: identify the needs generated by the proposal; detail the provision required including their specification and delivery schedule; and provide details about their funding, stewardship and monitoring, to ensure their successful implementation. These plans will be secured through Section 106 agreements.~~

Indoor and outdoor sports requirements

7. Residential development must contribute towards both indoor and outdoor sports facilities including ancillary uses such as changing facilities appropriate to the scale and location of the development, informed by needs identified in the Indoor Sports Facility Strategy, Playing Pitch Strategy and Outdoor Courts and Rinks Strategy or successor documents. Where justified, provision can be off-site via financial contributions towards publicly accessible provision.
8. Commercial development should avoid adverse impacts on publicly available sports facilities with on-site provision for employees. Where justified, this provision can be provided off-site via financial contributions towards publicly accessible provision.
Leisure routes

9. ~~New development will be required to provide or contribute towards leisure routes, suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. On or off-site contributions towards improved leisure routes include supporting Public Rights of Way Improvement Plans or providing leisure routes.~~

New burial grounds, cemeteries and crematoriums

10. Proposals for new cemeteries, burial grounds, natural burial sites, supporting buildings and extensions to existing facilities including crematoriums will be supported where it can be demonstrated that:

a. There is an identified need for additional burial provision for the community the proposal it intended to serve; The site is both accessible and close to the community it is intended to serve.
b. Burial facilities intended to serve new settlements, city-wide or sub-regional Proposed Submission Local Plan 2024 – 2045 549 c. communities would need to demonstrate that they are provided in a sustainable location, including supporting sustainable travel.
c. The proposal would not result in unacceptable impacts on the character, appearance or tranquillity of the location and includes appropriate landscaping, boundary treatments and planting;
d. The development would not conflict with Green Belt policy;
e. The development would not adversely affect groundwater Source Protection Zones (SPZ), surface water quality or the water environment in line with the Environment Agency's guidelines;
f. The proposal would not have an unacceptable impact on heritage assets and archaeological remains, to be assessed through appropriate investigation and mitigation where required;
g. Any traffic, parking, servicing, lighting or operational impacts would not result in unacceptable harm to residential amenity, local character or highway safety;
h. Where possible, existing trees, hedgerows, watercourses and other landscape features are retained and incorporated; and
i. That, where relevant, proposals should demonstrate how they respond to the burial requirements of different faith and community groups, including where these meet the needs of a sub-regional community.

Implementation

11. ~~The timely delivery of services and facilities will be required, including the provision of key services and facilities in early phases of the development.~~ Phasing will be established through planning obligations or conditions on a case-by-case basis, and this may include requirements for the use of meanwhile or temporary uses to ensure local needs can be supported until permanent facilities are delivered.
12. As appropriate to the nature of facilities and services provided, the developer will prepare management and maintenance strategies, to be approved by the Local Planning Authorities, to ensure robust and effective implementation, adoption and maintenance in the long term.

Summary

These representations have been submitted to supplement previous information submitted in support of the Site through previous Regulation 18 consultation and the conclusions and findings remain correct. This submission has addressed and responded to the transformed policy context of the Site in terms of the emerging Local Plan. Bidwells has identified that the Proposed Submission Local Plan continues to over rely on large strategic sites which have historically failed to start their delivery in a timely manner and then at much slower rates than the Council anticipated and relied upon.

The Site is highly sustainable and remains suitable, available and achievable for development to meet the growing needs of Cambridge and support the CB1 cluster.

Should you require any further information regarding the Site or these representations please do not hesitate to contact me.

Kind regards



Alison Wright
Partner

Appendix 1 **Site Location Plan : Land to the north of Station Road, Cambridge**

Enclosures **Affordable Workspace Policy J/AW – Viability Representation**

Land North of Station Road, Cambridge



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