Para / ref	Reg 19 Policy	Comment / Explanation
Climate Change		
Policy CC/DC: Designing for a changing climate	1. Planning applications must demonstrate that design solutions have been appropriately integrated that positively respond to our changing climate and reduce climate risks. This should include measures to mitigate the urban heat island including the use of green infrastructure to provide evaporative cooling, enhancing tree canopy cover to provide shade and the use of cool materials including cool roofs and pavements. 2. The design of buildings must reflect the cooling hierarchy to minimise the impacts of overheating in the built environment and reduce the demand for air conditioning systems. The cooling hierarchy, as illustrated by Figure 106, is as follows: a. Prioritise passive design solutions to minimise internal heat generation through: i. Reduction of excess solar gain entering the building in the summer and shoulder months through consideration of orientation and implementation of design measures including external shading, fenestration, albedo and green roofs; ii. Glazing ratios should respond to orientation, and floor to ceiling glazing on exposed elevations (south and west facing) should be avoided unless adequate external shading and a secure means of providing natural ventilation can be provided (such as louvre vents integrated into façade design where safety considerations are likely to lead to restricted window openings); iii. Energy efficient design to minimise internal heat generation with a focus on building services; and iv. Where heat is to be managed within the building through exposed thermal mass and high ceilings, provision must be made for secure nighttime ventilation to enable night purge. b. Then look to passive/natural cooling solutions: Use of outside air, where possible precooled by soft landscaping, a green roof or by passing it underground to ventilate and cool a building without the use of a powered system. This includes maximising cross ventilation, passive stack and wind-driven ventilation, and enabling night purge ventilation. All new dwellings should be designed to benefit from cross ventilation where feasible, with single aspect dwellings avoided as effective passive ventilation can be difficult or impossible to achieve. Where single aspect dwellings cannot be designed out, applicants will need to clearly demonstrate that their design has followed the cooling hierarchy and prioritised passive design measures and the use of external shading to reduce internal solar gains and have undergone detailed modelling of overheating risk to include consideration of future climate scenarios. c. Then look to mixed-mode cooling solutions: Using local mechanical ventilation/cooling provided where required to supplement the above measures using (in order of preference): i. low energy mechanical cooling (e.g. fan powered ventilation with/without evaporative cooling or ground coupled cooling); or ii. air conditioning – not a preferred approach as these systems are energy intensive.	Policy CC/DC should recognise that mechanical cooling may be necessary for research, laboratory and other specialist uses where passive, natural or mixed-mode solutions cannot meet operational, technical, safety or environmental requirements. The proposed amendment retains the cooling hierarchy by requiring demand to be minimised and the lowest-carbon solution to be selected, while allowing justified mechanical cooling. This provides a proportionate framework that supports climate objectives and the local research and innovation economy. The proposed amendment is to ensure the policy is effective.

	d. Then look to full-building mechanical ventilation/cooling systems: Ensuring the lowest carbon/energy options are selected and are only considered after all other elements of the hierarchy have been utilised. Where mechanical cooling is necessary to meet the evidenced operational, technical, safety or environmental requirements of a use, including research and development and other specialist facilities, proposals should demonstrate that demand has been minimised and that the selected system represents the most appropriate low-carbon solution.	
Policy CC/RE: Renewable energy projects and infrastructure	1. The Councils encourage proposals for renewable and low-carbon energy generation and associated infrastructure including battery storage at all scales, including domestic schemes. Proposals for development that generate energy from renewable and low-carbon sources, including associated infrastructure, grid connections and battery storage, will be supported, provided they do not cause unacceptable impacts that cannot be mitigated and are reversible, including cumulative and cross-boundary impacts, on: a. Landscape, tranquillity and sensitive views, with regard to the Greater Cambridge Landscape Sensitivity Assessment: Part 2 – Renewable Energy Development (2021); b. Biodiversity and geodiversity, including irreplaceable habitats and peat soils, protected habitats and species, and ecological networks; c. Water quality and flood risk; d. The best and most versatile agricultural land; e. The historic environment (including archaeological remains) and the setting of heritage assets; f. The Green Belt; g. Aviation apparatus and air traffic safety; h. Highways safety, and the safety of active transport infrastructure and rail movements; and i. Residential amenity, including potential impacts caused by noise, vibration, dust, odour, air quality and shadow flicker. 2. Proposals must seek to avoid, minimise and mitigate adverse impacts during construction and operation, wherever possible. Where any localised adverse impacts remain, these will be considered against the wider sustainability benefits of the proposal. 3. Where energy generated is not used for on-site needs, provisions must be made for the development to be connected directly and efficiently to existing national energy infrastructure, community energy infrastructure, or uses associated with the renewable energy development. Proposals should demonstrate how options for energy storage, smart grids, and energy sharing networks have been explored to reduce the need for grid capacity upgrades. Energy storage is encouraged onsite as part of the demand response and energy flexibility. 4. Proposals for renewable energy development must plan for the decommissioning of the site at the end of its life, including the removal of the technology and restoration of the site to its original or accepted use and condition, and that materials will be re-used and recycled where practical. 5. Any ecological enhancements and biodiversity net gain that have been achieved on-site should be retained in the decommissioning process.	Policy CC/RE should provide flexibility where connection to a heat network would not be the most sustainable or effective energy solution. In particular, requiring connection to a gas-led network could increase operational carbon emissions and conflict with the Plan's net zero requirements. The proposed amendment ensures that the network's fuel source and carbon performance are considered, allowing an alternative solution where this would deliver a lower-carbon outcome. The proposed amendment is to ensure the policy is effective.

	6. Proposals involving the provision of solar PV panels and canopies on existing buildings or above car parks will be strongly supported where they do not conflict with other policies in the Development Plan. Community-led renewable and low-carbon initiatives 7. Community-led renewable and/or low-carbon energy initiatives are encouraged and will be given positive weight in decision making. Evidence of community support for such proposals should be demonstrated, alongside any additional social and community benefits. 8. Community-led renewable and low carbon schemes that provide a community benefit in terms of profit sharing, or proportion of community ownership and delivery of local social and community benefit will also be encouraged and will be given positive weight in decision making. 9. Commercially led renewable energy schemes with a capacity over 10 megawatts shall provide an option for either a community benefit fund or an option for communities to own a proportion of the scheme subject to viability. Connection to district heating 10. Development proposals, including major refurbishments in the 2025 Heat Network Priority Area boundary, as shown on the Policies Map, should connect to existing heat networks or networks under development within this area, unless evidence is provided that demonstrates a connection would impact on the technical feasibility or viability of a proposal, or that connection would not represent the most sustainable or effective energy solution for the development. Further guidance on connection requirements is included within the CCCHN Future Proofing Guidance. 11. Subject to compliance with other policies in the Development Plan, proposals for new, low or zero carbon district heating infrastructure outside of the 2025 Heat Network Priority Area boundary will be supported, particularly in heat network zones that have been designated once the Government's heat network zoning policy is live.	
Policy CC/CS: Supporting land-based carbon sequestration and carbon sinks	Protection of Peat Soil 1. Where major development is proposed on land containing peat soils, a proportionate evaluation of the impact of the proposal on the soil's carbon content and an appropriate soil management plan must be submitted as part of the planning application. 2. There will be a presumption in favour of preservation of peat in situ. Proposals that will result in unavoidable harm to, or loss of, peat soils will only be permitted if it is demonstrated that there is clear evidence of need for the development that outweighs the harm to peat soils, and that an alternative viable option is not available for the proposed development. 3. Any potential harm to peat soils associated with a development proposal must be reduced to the minimum possible level. Appropriate provision, to the satisfaction of the Local Planning Authority, must be made for the evaluation, recording and interpretation of peat soils prior to the commencement of development. 4. Where exceptional circumstances are demonstrated that would justify the removal of peat soil, peat soil removal must only be conducted with the guidance and supervision of a suitably qualified and experienced soil scientist or	The proposed amendment is necessary to provide clarity on how sequestration will be a material consideration in decision making. The proposed amendment is to ensure the policy is effective.

	practitioner, to an approved plan. For other soils, the DEFRA Code of Practice for the Sustainable Use of Soils on Construction Sites (2009) (or successor documents) should be followed. 5. Peat and other soils must be appropriately stored and eventually used, all in a way that would limit carbon emissions into the atmosphere as far as possible 6. Proposals to enhance peat soils and protect its qualities will be supported, as will proposals to help strengthen existing carbon sinks or create new ones. Carbon sequestration in new development 7. All major development proposals, including strategic sites, should seek opportunities to enhance the carbon sequestration potential of their proposals through green infrastructure and new habitat creation. The demonstration of meaningful carbon sequestration where there is a significant net gain within a proposal through nature-based solutions will be a material consideration in the decision-making process, including as part of the WLC Assessment.	
Biodiversity and green spaces		
Policy BG/BG: Biodiversity and geodiversity	Biodiversity net gain and ecological enhancements 1. All development must deliver statutory biodiversity net gain (BNG), providing a minimum of 10% BNG against the baseline, unless exempt under the Environment Act 2021, to be provided on-site in line with guidance. 2. Major development must provide a minimum 20% biodiversity net gain (BNG), (unless exempt under the Environment Act 2021), to be provided on-site where this is feasible and effective, or off-site where onsite options for BNG have been evidenced to be exhausted as agreed with the relevant Local Planning Authority (LPA). 3. Planning applications subject to mandatory BNG will require a Biodiversity Gain Plan to be submitted to, and approved in writing by, the LPA prior to commencement of development. 4. Opportunities to deliver measures which align with those identified in the Cambridgeshire and Peterborough Local Nature Recovery Strategy as part of any net gain provision should be prioritised, particularly where a proposal is within a habitat priority area identified within the LNRS. 5. Off-site BNG should be delivered via the purchase of biodiversity units from a registered strategic habitat bank provider as listed on the Defra Biodiversity Gain Sites Register, or through a bespoke scheme on a site registered on the Defra Biodiversity Gain Sites Register, or through the purchase of statutory biodiversity credits, or a combination of the above. Where it is necessary to use a biodiversity offset site, the LPA will encourage delivery of replacement habitat within habitat priority areas identified within the Cambridgeshire and Peterborough Local Nature Recovery Strategy. 6. Habitat enhancement and creation measures, including their establishment and ongoing management and monitoring, will be prescribed and secured through conservation covenants, planning conditions and / or obligations. Protection of biodiversity and geodiversity	The addition of 'where practical and viable' to paragraph 12 is necessary to recognise that integrated nest boxes may not be appropriate for all forms of development. Medical and other specialist buildings may be subject to operational, patient safety, hygiene or maintenance constraints that prevent their installation. The amendment retains the requirement wherever feasible, while allowing site-specific constraints to be taken into account. The proposed amendment is to ensure the policy is effective.

	7. For proposals where development may affect biodiversity (including sites of biodiversity importance, habitats and species of principal importance) or sites of geodiversity, prior to the determination of an application, applicants will provide survey information and site assessment that is proportionate to the likely severity of impacts. 8. Proposals coming forward on sites within the Natural England Impact Risk Zone for the Eversden and Wimpole Woods SAC and/or identified as having moderate or high suitability to support Barbastelle bats, will be required to undertake bat surveys in order to identify impacts and any necessary mitigation measures. 9. Development proposals which have a direct or indirect adverse effect on sites of biodiversity or geological importance as identified on the Policies Map (or other sites which meet the published criteria for selection), will not be permitted. Exceptions will only be made where the benefits of the development significantly outweigh any adverse impacts. In such cases where development is permitted, proposals must demonstrate that the mitigation hierarchy has been implemented, and the intrinsic natural features of particular interest must be safeguarded and enhanced, having regard to: a. The international, national or local status and designation of the site; b. The nature and quality of the site's features, including its rarity value; c. The extent of any adverse impacts on the notified features; d. The likely effectiveness of any proposed mitigation with respect to the protection of the features of interest; and e. The need for compensatory measures in order to re-create, on or off the site, features or habitats that would be lost to development. 10. Development must protect and enhance irreplaceable habitats within Greater Cambridge. Development negatively impacting irreplaceable habitat will not be permitted unless wholly exceptional circumstances are demonstrated, and a bespoke compensation strategy is provided. 11. Development proposals within or near to Important Invertebrate Areas (IIA) (as mapped by Buglife England) should protect and enhance habitat features for invertebrates via site design and ongoing management. 12. All development must provide integrated nest boxes (a combination of bird, bat & insect boxes) appropriate to type and scale of development to target protected, priority and other species associated with the built environment where practical and viable.	
Policy BG/GI: Green infrastructure	1. All development proposals must demonstrate how they protect and enhance green infrastructure appropriate to the development's scale and location. 2. Planning applications for major development must submit a Green Infrastructure Plan, and at the outline planning stage must also provide a Green Infrastructure (GI) Statement that demonstrates how green infrastructure has been integrated into the design approach at an early stage, to ensure that on-site green infrastructure is: a. Multifunctional – individual features in combination contribute to a network of multiple benefits; b. Connected – provides or enhances connectivity in the landscape for the benefit of nature and people;	The amendment to paragraph 6 aligns the policy with Policy BG/EO by applying a consistent 30-year management period for green infrastructure. This provides a clear and proportionate timeframe for securing funding, stewardship and ongoing maintenance, while avoiding the uncertain and potentially disproportionate requirement to manage green infrastructure for the lifetime of the development. The amendment would therefore make the policy more consistent, effective and capable of implementation.

	c. Sympathetically placed – reflects and/or creates a sense of place, considerate to the context and character of the local environment and priorities of its people and wildlife; d. Resilient – responds to the climate emergency in a positive, contributory way, reducing flood risk where possible; e. Responsibly managed – has a sustainable mechanism to support its life-long function and benefits; and f. Environmentally sensitive – mitigates its own local impact and improves the quality of the immediate natural environment. 3. Development of 100 dwellings or more or 5,000 square metres or more of gross internal floorspace (GIA) will be encouraged to seek accreditation under the Building with Nature Standards. 4. The following strategic green infrastructure initiatives are identified priorities for enhancing strategic green infrastructure across Greater Cambridge. a. Revitalising the chalk stream network b. River Cam Corridor i. River Cam Corridor (North East Cambridge to Waterbeach) ii. River Cam Corridor (through Cambridge City) iii. River Cam Corridor (south of Cambridge City) c. Gog Magog Hills and chalkland fringe d. Enhancement of the eastern fens e. The Great Ouse fenland arc f. North Cambridge green space g. West Cambridge Green Infrastructure buffer – Coton Corridor h. Western gateway multifunctional Green Infrastructure corridor i. Pollinator corridors Dispersed initiatives j. Expanding Greater Cambridgeshire's 'urban forest' k. Woodland expansion and resilience l. Urban greening and 'de-paving' m. Allotments and community gardening	

	n. Environmentally friendly farming 5. Major development located within an area identified for one of the strategic green infrastructure initiatives must demonstrate how the design of on-site green infrastructure has had regard to the relevant initiative's objectives. 6. A GI Operation and Maintenance Plan must be submitted to and approved in writing by the relevant Local Planning Authority, before any development is occupied. The approved plan shall ~~thereafter be implemented for~~ ~~the lifetime of the development~~ outline how the space will be managed over a 30-year period and the funding and stewardship arrangement for implementing the management plan, secured via condition.	
Policy BG/TC: Tree canopy cover and the tree population	1. All applications for development where there are trees on, or immediately adjacent to the development site, should be made in accordance with the recommendations set out in BS5837: 2012 (Trees in relation to design, demolition and construction – Recommendations) and accompanied by an Arboricultural Impact Assessment and a tree protection plan and/or a Hedgerow Survey that demonstrates how the proposal: a. Evaluates, preserves, protects and enhances existing trees and hedgerows on site; b. Ensures retained trees and/or hedgerows are integrated into the development design to ensure their long-term preservation; and c. Ensures that there is sufficient space above and below ground, for existing, replacement and newly planted trees, hedgerows and other vegetation to mature and to be maintained in the long term. 2. Where the felling of existing trees or hedgerows is approved as part of a planning application, appropriate replacement planting must be agreed with the LPA that achieves a position of no net loss of tree and/or hedgerow cover, unless exceptional ecological, historical, landscape or operational reasons justify not doing so. 3. Development will not be permitted if it involves felling, significant surgery (either now or in the foreseeable future), or potential root damage to trees of amenity value, unless otherwise approved by the relevant Local Planning Authority on a case-by-case basis, weighing up the impacts of removal against the benefits of development. Where the felling of trees of amenity value is approved, appropriate replacement planting will be required to be agreed with the Local Planning Authority. 4. To ensure the protection of any trees which are to be retained, conditions may be attached to any grant of planning permission requiring the submission and approval of an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) prior to the commencement of development. The AMS should be phased in line with the construction timetable 5. Where new trees are provided, planting must: a. Be of species which are appropriate for the conditions of the site, including consideration for climate change; and b. Support species diversity and incorporate long-lived trees within the treescape design. 6. Development which includes the planting of trees and/or hedgerows must contribute to their long-term maintenance, which will be secured via planning conditions and/or obligations as appropriate.	The amendments to paragraphs 7 and 8 clarify the applicable minimum buffer zones for ancient woodland and ancient or veteran trees. They retain the expectation that development should avoid these buffers, while allowing a different approach to be agreed with the Local Planning Authority where justified by site-specific evidence and where harm can be avoided or appropriately mitigated. This provides necessary flexibility without weakening the protection afforded to these irreplaceable habitats.

	7. The size of buffer zone to be provided between development proposals and ancient woodland must be agreed with the LPA, supported by evidence demonstrating how this avoids harm to the relevant ancient woodland. Development proposals, including through the construction phase, must maintain at least a 15 metre buffer zone from the boundary of any ancient woodland, and should aim for ~~at least~~ 50 metres, unless otherwise approved by the Local Planning Authority. 8. Development proposals must maintain a buffer zone around individual ancient and veteran trees of at least 15 times the tree's diameter, or 5 metres from the edge of the tree's canopy if that area is larger , unless otherwise approved by the Local Planning Authority. The scale of buffer zone around an ancient or veteran trees should be informed by the calculated Root Protection Area.	
Policy BG/EO: Providing and enhancing open spaces	1. New development must address the open space needs it generates, which will be secured through a mix of on-site provision and/or financial contributions for off-site open space provision, enhancement and/or management. 2. For green space and/or, open space, play and food growing space the scale and type of on-site provision, and any required financial contribution to off-site provision, will be determined in agreement with the Local Planning Authority, having regard to: a. Site-specific constraints and opportunities, including the ability for the site to provide effective space/s for each typology at a scale that would be effective; and b. Existing local provision and identified gaps in the relevant space type, including for accessible greenspace when assessed against the size-proximity criteria (as defined in Figure 111). Accessible Green and Open Space Standards 3. All major developments that are predominantly residentially led must demonstrate total provision of accessible greenspace equivalent to 7.0 hectares per 1,000 population wherever practical and viable, ~~and w~~ Within this total, deliver a minimum on-site accessible greenspace provision that: a. Is equivalent to 3.0 hectares per 1,000 of the population, unless the calculated on-site quantum falls below a functional minimum parcel size of 0.5 hectares. In such cases, the shortfall must be secured off-site; and b. Ensures access for all residences within the development to at least one appropriate tier of greenspace within the size-proximity criteria (as defined in Figure 111). 4. 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 wherever practical and feasible; and/or; b. 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. 5. All green and/or open space must be designed to be welcoming and accessible meeting the needs of all users, with habitats and infrastructure appropriate to the local character and typology of greenspace. Green and/or open space design and management planning must have regard to best practice guidance as defined by the Green Flag Award criteria.	The proposed amendments introduce necessary flexibility into paragraph 4 and are supported as a minimum. However, the underlying requirement for commercial development to provide 2 hectares of open space per 1,000 employees is not sound and should be reviewed further before adoption. The proposed standard appears significantly higher than the level of open space typically delivered within successful research, innovation and healthcare campuses. Experience from the Cambridge Biomedical Campus demonstrates that occupier demand is driven primarily by the quality, functionality and accessibility of open space rather than a prescribed quantitative ratio. These locations continue to attract world-leading organisations despite providing lower levels of open space than those proposed. The standard should therefore be reviewed and calibrated against local evidence and delivery experience. As drafted, the policy risks imposing a requirement that is not representative of successful employment environments already operating within Cambridge. It could result in less dense development, contrary to the requirement for an urban grain that facilitates interaction. In addition, requiring 2 hectares of open space per 1,000 employees could result in less efficient use of land in the most sustainable and accessible locations, including land released from the Green Belt to meet identified development needs. This would run counter to the objectives of concentrating growth in highly sustainable locations, supporting compact patterns of development and maximising the use of scarce land resources. There is also a risk that excessive on-site requirements could divert land from research, healthcare and employment floorspace, potentially undermining the delivery of strategic economic objectives. The policy should therefore place greater emphasis on the quality, accessibility and functionality of open space, whilst allowing the amount and form of provision to respond to site circumstances, viability, operational requirements, existing local provision and the character of the surrounding green infrastructure network. Any quantitative standard should be evidence-based and refined to reflect the lessons learned from the delivery and operation of major employment sites.

	6. The residual accessible green and/or open space requirement not provided on-site will be secured as off-site provision and / or financial contributions to the delivery and/or management of accessible green and/or open space. Offsite contributions should be provided towards greenspaces that are within the relevant access catchments for the development as set out in Figure 111, and where possible, support the objectives of the Green Infrastructure Strategic Initiatives identified in the Greater Cambridge Green Infrastructure Opportunity Mapping Recommendations Report (2021) and green infrastructure schemes identified within the Greater Cambridge Local Plan Infrastructure Delivery Plan (or successor document). 7. Accessible Green Space provision for development proposals that are located within a zone of potential risk for a publicly accessible Site of Special Scientific Interest (SSSI) that is sensitive to the effects of recreational pressure, must be informed by Natural England guidance and delivered alongside early phases of development. For such development proposals: a. On-site Accessible Green Space provision must include areas designed to absorb significant proportions of the day-to-day recreational needs of residents; and b. Any off-site contributions should be prioritised towards greenspaces that are located and designed in such a way that mitigates the impacts on the SSSI/s that are affected by that development. Play and Youth Space 8. All major developments that are predominantly residentially-led must demonstrate provision of play and youth space equivalent to 0.6 ha per 1,000 population. This should include at least 0.25 ha per 1,000 population of equipped play and at least 0.3 ha per 1,000 population of informal play provision. 9. Play space provision must be designed prioritising quality, inclusivity, and integration into the wider green infrastructure network in line with national best practice as defined by Fields in Trust, Play England and Active Travel England. 10. Any shortfall in the provision of play and youth space onsite must provide a financial contribution towards the provision of play and youth space offsite. Food growing space 11. All major developments that are predominantly residentialled must demonstrate provision of food growing space equivalent to 0.4 ha per 1,000 population. 12. Food growing spaces should be provided on-site by default. The design, approach to on or off-site provision, and management of food growing spaces must be informed by the Food Growing Study or successor document. 13. Any shortfall in the provision of food growing spaces on-site must provide a financial contribution towards the provision of food growing space offsite. GI Operation and Maintenance Plan	**SUMMARY**: The requirement for 2 hectares of open space per 1,000 employees is not justified and should be reviewed before adoption. Experience at Cambridge Biomedical Campus demonstrates that successful research and healthcare environments can attract world-leading organisations without meeting such a prescriptive standard. As drafted, the policy could reduce development density, constrain the efficient use of sustainably located land, including land released from the Green Belt to meet identified needs, and potentially undermine the delivery of research, healthcare and employment floorspace. Any quantitative standard should be evidence-based and allow flexibility to respond to site-specific circumstances.

	14. All green space, open space, play and/or food growing space must have an adopted management plan (GI Operation and Maintenance Plan), outlining how the space will be managed over a 30-year period, and the funding and stewardship arrangement for implementing the management plan, secured via condition.	
Jobs		
Policy J/AW: Affordable workspace and creative industries	1. Proposals for new office and R&D development (use classes E(g)i and E(g)ii) over 1,000 square metres will be required to provide a minimum of 10% of net additional floorspace (GIA) as affordable workspace. a. Within the Defined Development Extent of Cambridge and allocations on the edge of Cambridge, and within specified established science and business parks in Greater Cambridge and proposed extensions to these allocated within this Plan, the affordable workspace discount should be a minimum of 30% below prevailing market rents in perpetuity; b. Within South Cambridgeshire, outside the Defined Development Extent of Cambridge and specified established science and business parks, the affordable workspace discount should be a minimum of 20% below prevailing market rents in perpetuity. 2. Proposals for new Industrial and Storage developments (use classes E(g)iii, B2 and B8) over 2,500 square metres will be required to provide a minimum of 10% of net additional floorspace as affordable workspace (GIA) at a minimum of 20% below prevailing market rents in perpetuity. 3. The details of the form and nature of affordable workspace to be provided will be agreed with the councils on a case-by-case basis however, the following requirements will apply when affordable workspace is secured: a. The type and specification of affordable workspace must address an identified local need. Workspace types may be affordable artist studios, office, research and development, light industrial or general industrial workspace and maker spaces in light industrial use. b. Subject to paragraph 3c. below, affordable workspace schemes must be operated and managed: i. By an affordable workspace provider on the Councils' approved list; or ii. By the owner, or alternative party, where it is demonstrated to the satisfaction of the council that they have the necessary skills and experience. c. Where occupiers are from specific sectors that have cultural or social value such as cultural organisations, charities, public health services, voluntary and community organisations, the councils will explore opportunities for long term management and delivery of workspace by the occupiers, in which case it will need to be demonstrated to the satisfaction of the Councils that the occupiers have the necessarily skills and experience to do so. d. Where affordable workspace is required: i. An Affordable Workspace Statement must be submitted at the outline or full planning application stage; and ii. An Affordable Workspace Operational Management Plan must be prepared by the developer, submitted to and approved by the Councils at least three months prior to the first occupation of the development; e. The affordable workspace should be made available for occupation at the same time as, or prior to, the first occupation of 50 percent of the non-affordable element of the remaining economic floorspace in the development, unless justified on site specific circumstances. The 50% threshold may be reviewed through viability evidence or phasing discussions on particularly large or complex schemes; and	The objective of supporting affordable workspace is supported; however, the policy should provide greater flexibility for strategic sites, science parks and major research and healthcare campuses. These locations operate differently from conventional office developments, with occupiers often requiring highly specialised accommodation, shared facilities, collaboration space and opportunities for business incubation and growth. A requirement to distribute affordable workspace across individual plots or buildings may not deliver the most effective outcome and could result in fragmented provision that is difficult to manage and less attractive to prospective occupiers. Experience at the Cambridge Biomedical Campus and other established innovation clusters demonstrates that dedicated innovation hubs, incubator space and managed grow-on accommodation can often provide greater economic and innovation benefits than dispersed affordable floorspace. The policy should therefore allow strategic sites to agree a bespoke delivery model that responds to their particular functions, phasing and operational requirements. This could include consolidating affordable workspace provision within a dedicated building or campus-wide offer, enabling a broader range of start-ups, scale-ups, health, research, innovation and community-focused organisations to access suitable accommodation. Such an approach would better support the wider ecosystem, provide greater flexibility over time and help maximise the economic and social benefits generated by these nationally significant employment locations. **SUMMARY:** The objective of supporting affordable workspace is welcomed. However, the policy should provide greater flexibility for major research and healthcare campuses. Requiring affordable workspace to be dispersed across individual plots may not deliver the most effective outcome. Experience at Cambridge Biomedical Campus demonstrates that dedicated innovation hubs, incubator space and managed grow-on accommodation can better support start-ups, scale-ups and research-led organisations. The policy should therefore allow bespoke, campus-wide delivery models that respond to operational requirements and maximise economic and innovation benefits.

	f. Affordable workspace secured should be provided on-site unless a suitable alternative location within a suitable location near to the development, such as within the science or business park in which the development is located, is agreed with the councils. 4. Payment in lieu will only be acceptable in the following circumstances: a. Where an occupier requires exclusive use of a single office property, such as a global headquarters building, evidenced by a signed agreement for lease, pre-let or owner-occupier commitment confirming the exclusivity requirement; or b. Within developments involving multiple landowners, where the applicant demonstrates that coordinated on-site delivery and long-term management has been explored and is not reasonably achievable; or c. Where the applicant and Councils agree that an in-lieu contribution would deliver materially greater economic, operational or placemaking benefit than on-site provision; or d. Where the applicant demonstrates, through an independently assessed open-book Viability Assessment undertaken in accordance with the Councils' adopted viability methodology, that on-site provision is not viable. e. Within strategic allocations, science parks, and major research, healthcare or innovation campuses, a bespoke approach to affordable workspace provision may be agreed with the Councils, having regard to the scale, function, phasing and operational requirements of the development. This may include the consolidation of affordable workspace provision within dedicated innovation, incubation or accelerator space, or alternative mechanisms that demonstrably support start-up, scale-up, community, health, research or innovation-related occupiers.	