Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name	Harry Bunbury	Sophia Nitschke
Organisation (where relevant)	Henry Boot Developments Limited	Twenty5 Planning Limited
Job Title (where relevant)		Senior Planner
Address, including Post Code		50/60 Station Road Cambridge CB1 2JH
Telephone		[redacted]
Email address		[redacted]

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy J/AW
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	No

Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

HBD has significant concerns regarding the soundness of Policy J/AW as it applies to E(g)(iii), B2 and B8 development. As drafted, the policy requires industrial and storage developments over 2,500 sqm to provide a minimum of 10% affordable workspace, at a minimum 20% discount to market rents, together with associated management, monitoring and operational requirements.

The Greater Cambridge Affordable Workspace Study 2026 identifies affordability pressures for smaller and early-stage businesses, however, it does not adequately demonstrate why it is a necessary to provide affordable workspace as part of all qualifying industrial and storage development The policy therefore needs to demonstrate clearer reasoning between i) the identified need ii) the type of development from which the affordable workspace obligation is to be secured, and iii) where it should be located.

This is particularly relevant for schemes such as AvTech, which have been designed to respond to the unique opportunity to be sited adjacent to an airfield. With the planned closure of Cambridge City Airport, Duxford will become the only operational airfield within Cambridgeshire. The proposal offers the opportunity for bespoke units to be designed to meet the needs of occupiers related to the aviation industry, as opposed to open ended wider employment uses. The Council's own evidence recognises the concept of affordable workspace may not be feasible in all situations, particularly where exclusivity is required by occupiers, suggesting payment in lieu.

In addition, there is also a broader issue regarding the relationship between affordable workspace and the supply of employment floorspace. The Greater Cambridge Local Plan identifies a substantial requirement for new employment floorspace and seeks to support continued economic and employment growth. New employment development increases the overall supply and diversity of available premises, enables businesses to relocate into modern accommodation and can release existing premises for other occupiers. The imposition of additional costs on new employment development may, however, have the opposite effect if it reduces land values, affects viability, delays delivery or discourages investment.

The Affordable Workspace Study identifies 10% as a benchmark but acknowledges that provision should reflect viability, site characteristics and development context. However, Policy J/AW applies a blanket 10% requirement across all qualifying E(g)(iii), B2 and B8 development regardless of scheme type, operational characteristics or market conditions. This is simply not justified. Similarly, insufficient justification is provided for requiring a minimum 20% rental discount and provision in perpetuity.

The policy raises significant viability concerns. In addition to discounted rents, it introduces management, monitoring and operational requirements which would add to the burden for schemes, particularly those outside of the centre of Cambridge.

It is noted that South Cambridgeshire District Council and Cambridge City Council are both independently bringing forward a Community Infrastructure Levy (CIL), with the CIL Examination programmed to take place on 12th October 2026.

HBD responded to the CIL Consultation in March 2026 to raise objection to the proposed CIL rates. At the time of writing, Examination has not been concluded and there remains significant unresolved objection from various stakeholders. HBD has highlighted within their duly made representations that:

- The Draft CIL Charging Schedule is not supported by a sufficiently robust viability or infrastructure evidence base.
- The proposed CIL rates fail to reflect differences in employment typologies – specifically mid-tech, the differences across the geography of the authority areas, risks double-charging alongside Section 106, and
- The proposed CIL may undermine the viability and deliverability of sites and wider aspirations of the emerging Local Plan.

Whilst the emerging CIL charging schedule has been considered as part of the Aspinall Verdi Regulation 19 'Main Viability Report'. The CIL examination is programmed to take place after the close of this consultation and before submission of the Plan. HBD reserves its position on the interaction between the emerging CIL and the deliverability of the Plan's policy requirements, and will address the matter further once the CIL examination outcome is known.

The local plan viability must be considered alongside the cumulative impact of other Local Plan obligations, including CIL, biodiversity net gain, net zero requirements, transport infrastructure and Section 106 contributions. The Plan should demonstrate that these combined requirements will not undermine the delivery of employment development.

The policy therefore be substantially amended to provide a more targeted, flexible and proportionate approach. In particular, the blanket 10% requirement should be replaced with a scheme-specific approach based on demonstrated local need, operational suitability and viability, including the cumulative cost of other Local Plan and infrastructure requirements.

The policy should provide greater flexibility where the characteristics of operationally, in this case, specialised aviation technology floorspace, make on-site provision of 'open ended' 'affordable employment use' incompatible. Especially with the Publication Plan requires the delivery of a 'Skills and Employment Plan' at draft 'Policy WS/IO: Creating inclusive employment and business opportunities through new developments' which would already provide key opportunities for local businesses.

As currently drafted, Policy J/AW risks constraining the delivery of specialist employment floorspace like AvTech, and has not demonstrated that it will effectively address the affordability issues identified in the evidence base.

Please provide a 100 word summary of your representation.

HBD objects to Policy J/AW on the basis that it is not justified, effective or sufficiently flexible. The policy imposes a blanket requirement for 10% affordable workspace within all qualifying E(g)(iii), B2 and B8 developments, despite limited evidence demonstrating that such an approach is appropriate across all employment sectors and locations. Particular concerns arise for specialist schemes such as AvTech, where operational requirements may make on-site affordable workspace unsuitable. The policy also raises significant viability concerns when considered alongside CIL, BNG, net zero and infrastructure obligations. A more targeted, scheme-specific approach is required, taking account of demonstrated need, operational suitability, viability and cumulative development costs.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Please refer to the full representations submitted in support of this response.

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Amend Policy J/AW to replace the blanket requirement for 10% affordable workspace, a minimum 20% rental discount and perpetual provision across all qualifying E(g)(iii), B2 and B8 development with a more flexible, scheme-specific approach. The policy should require affordable workspace only where a clear local need has been demonstrated and where provision is operationally appropriate and viable. The policy should also explicitly account for viability and the cumulative impact of other development obligations, including CIL, biodiversity net gain, net zero standards, transport infrastructure and Section 106 contributions, to ensure that employment development is not unduly constrained and that the Plan's wider economic growth objectives can be achieved.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Participation at the Examination Hearing is necessary as the Local Plan is overall not considered to be legally compliant or sound. Attendance at the hearing sessions will provide an opportunity to explain these concerns in greater detail, respond to matters raised by the Inspector and other parties, and discuss the modifications required to make the Plan sound.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes