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		Rachel McGall
Organisation (where relevant)	Universities Superannuation Scheme c/o Agent	Montagu Evans
Job Title (where relevant)		Associate
Address, including Post Code		
Telephone		
Email address		

* 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 S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)
Proposed Submission Policies Map	Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure) Allocation
Sustainability Appraisal	N/A
Habitats Regulations Assessment	N/A

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

Test	**Yes / No**
Legally compliant	Yes
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.

Overall, our Client continues to support the Councils' aspiration for the regeneration of the Site for a mix of uses over the Plan period (up to 2045). However, Policy S/C/LCR has changed materially since the Regulation 18 consultation, and in our Client's opinion, now places significant and unnecessary hurdles to deliver the regeneration of the Site. Therefore, our Client requests modifications to provide a positive policy context to ensure future redevelopment proposals are deliverable and commercially viable.

Draft Policy S/C/LCR combines the Cambridge Junction and Cambridge Leisure sites with the Clifton Road site Allocation to create a comprehensive, strategic allocation for the area. Whilst our Client does not object to the principle of a combined allocation, the policy must be flexible to enable redevelopment to be delivered by different landowners at different times within an overall policy framework.

Draft Policy S/C/LCR of the Regulation 19 Local Plan, is materially more prescriptive than the Regulation 18 draft and, in several respects, departs from the flexibility necessary to facilitate the successful delivery of a complex, long-term redevelopment project. The policy introduces a mandatory site-wide masterplanning requirement, additional transport and infrastructure obligations, extensive safeguarding provisions and an inflexible requirement to re-provide the existing quantum of industrial and storage floorspace. These requirements risk placing disproportionate constraints on development and creating unnecessary barriers to implementation.

In particular, the draft policy fails to adequately reflect the fragmented ownerships, diverse operational requirements and ranging delivery timescales that characterise the Allocation. It also does not reflect the planning process of the East West Rail project which, as a Nationally Significant Infrastructure Project (NSIP) will be submitted as a Development Consent Order application (DCO) and assessed by the Planning Inspectorate. Whilst the Council will play an important role in the DCO as a host authority, it will not be in control of the decision-making process or timescales. As currently drafted, there is a genuine risk that development on individual parcels could become contingent upon matters outside the control of our Client, resulting in delay, increased cost and uncertainty. This risks undermining both the viability of redevelopment proposals and the timely delivery of the homes, employment space, infrastructure and wider regeneration benefits that the Allocation is intended to secure. Accordingly, our Client considers that draft Policy S/C/LCR has not been positively prepared, is not justified, effective or consistent with National Policy, and therefore is unsound.

On the basis of the above, our client objects to the draft wording of Policy S/C/LCR and requests a number of amendments to the policy wording which are detailed below.

Masterplan-Led Development

Our Client supports the principle of coordinated redevelopment and agrees that proposals should positively contribute to the wider objectives of the Allocation. A framework which establishes broad design, movement and infrastructure principles is appropriate for a site of this scale and strategic importance. However, our Client objects to the requirement in Criterion 3 of draft Policy S/C/LCR that:

"The masterplan should be agreed by the Council prior to the approval of any planning applications."

The Regulation 18 policy sought a masterplan-led approach which ensured coordination with adjoining development. The Regulation 19 policy goes materially further by requiring a site-wide masterplan covering the wider Allocation and requiring that masterplan to be agreed by the Council before any planning application is approved.

The Allocation includes several distinct landownerships and established operational uses. There is no certainty that all landowners will agree a detailed masterplan and delivery arrangements, let alone at the same time, or more importantly, prior to an application being determined by the Local Planning Authority. As such, the draft policy has the potential to make the delivery of one parcel dependent upon the agreement of third-party landowners, which could delay investment and regeneration of the site.

With regards to the future eastern station entrance, these proposals will be submitted as a Development Consent Order and assessed by the Planning Inspectorate. Whilst the Council will play an important role in the DCO as a host authority, it will not be in control of timescales or the decision-making process. As currently drafted, there is a genuine risk that development on individual parcels could therefore become contingent upon matters outside the control of our Client and the Council, resulting in delay, increased cost and uncertainty.

Furthermore, the requirement to agree a masterplan with the Council and other landowners prior to approval <u>of any planning application</u> reduces the ability of longer-term proposals to respond to changing commercial, occupational and infrastructure circumstances. It should be noted that Land Securities are currently in the process of selling the Cambridge Leisure site, which to the best of our knowledge, has received interest from investors seeking to retain the Leisure Park in its current form. Given this portion of the allocation is unlikely to come forward until the longer-term, fixing the masterplan at this stage will create an in-flexible policy framework for future development.

In light of the above, instead of a mandatory site-wide masterplan, we suggest individual proposals should demonstrate compliance with an agreed set of strategic design and development principles. These development principles would address matters such as land-use relationships, movement corridors, public realm, infrastructure interfaces and the avoidance of prejudice to adjoining land. This would secure appropriate coordination without requiring detailed agreement across landownerships that may progress at different times.

The policy should also expressly recognise that development may be delivered in phases and that an individual parcel may come forward independently where the proposal:

- complies with the strategic principles for the wider Allocation;
- provides an appropriate relationship with existing and future adjoining development;

- delivers or contributes proportionately towards the infrastructure necessary for that phase;
- does not prejudice the reasonable future development of adjoining land; and
- demonstrates that the proposal is acceptable on its own planning merits.

With consideration to the above, our Client seeks amendments to Criterion 3 of draft Policy S/C/LCR to ensure that the absence of an agreed detailed masterplan for the whole Allocation does not prevent the approval of an otherwise acceptable planning application. Accordingly, Criterion 3 is proposed to be amended on as follows:

> *"A set of site-wide strategic design and development principles should be prepared by the landowners/ promoters in conjunction with the Council and following proportionate engagement with relevant stakeholders. The principles should have regard to the indicative Spatial Framework shown at Figure 13 and will need to identify the broad distribution of land uses, infrastructure delivery and anticipated phasing.*
>
> *Development may come forward on a phased or parcel-by-parcel basis. Planning applications should demonstrate how the proposed development responds positively to the strategic principles and wider objectives of the Allocation and does not unreasonably prejudice the future development of adjoining land."*

Phasing of Development

Our Client welcomes Criterion 5 of draft Policy S/C/LCR which recognises that development proposals may be delivered on a phased approach. However, this is not carried consistently through the remainder of the policy, which implies that the Allocation will be planned, funded and delivered as a single comprehensive project.

The Policy should recognise that different land parcels will be subject to different issues, viability considerations, lease and vacant possession timings and delivery timescales. It is counterintuitive to bring forward a large site in multiple ownership on a basis that requires an individual landowner to resolve every site-wide matter before bringing forward a planning application on its own. Nor should a planning application be delayed solely because neighbouring land is not being actively promoted nor an agreement reached with every adjoining owner.

Accordingly, our Client requests the following amendments to criterion 5 of draft Policy S/C/LCR:

> *"Development proposals, including those being delivered as individual parcels or using a phased approach, must positively contribute to the wider development objectives for Land at Clifton Road in line with the principles identified in the indicative Spatial Framework diagram (Figure 13), and they must not prejudice the potential future redevelopment of adjacent sites. The absence of redevelopment proposals or agreement from other landowners within the Allocation should not, in itself, prevent an otherwise acceptable development from coming forward."*

Apportionment of Infrastructure

The Regulation 19 draft Policy S/C/LCR introduces a substantial range of infrastructure, mitigation, safeguarding and financial requirements. These include measures relating to the safeguarding of the eastern station entrance, the Chisholm Trail, cycle parking, mobility hubs, public realm, transport mitigation, pick-up and drop-off facilities, servicing, monitoring and wider station-area infrastructure. Whilst our Client recognises that development should make appropriate contributions towards infrastructure, the policy must ensure that obligations are fairly and reasonably related to the scale, nature and effects of the development proposed and apportioned to elements of the overall allocation-not a first past the post approach.

The current policy is not clear regarding which land should be safeguarded for the identified 'physical transport measures', the evidence supporting the extent of that safeguarding, the mechanisms through which infrastructure costs will be apportioned between development parcels, or how the policy will avoid an early development parcel carrying a disproportionate share of site-wide costs.

No development parcel should be required to provide or fund infrastructure purely because it is the first part of the Allocation to come forward. In particular, a parcel should not be required to deliver strategic infrastructure that is not necessary to make that development acceptable in planning terms, or which principally serves other land, the wider station area or later phases. Infrastructure requirements should be supported by robust evidence and should be proportionate to the impacts generated by each development.

In light of the above, our Client requests the following additional wording to draft Policy S/C/LCR relating to the apportionment of infrastructure:

> *"Infrastructure, mitigation measures and financial contributions will be apportioned fairly and proportionately between development parcels, having regard to the scale, nature and impacts of the development proposed and the degree to which each parcel benefits from the relevant infrastructure.*
> *An individual proposal will not be required to deliver or fund infrastructure which is not necessary to make that proposal acceptable in planning terms."*

Employment and Industrial Floorspace

Our Client continues to support the inclusion of a range of employment uses within the Allocation. A flexible commercial offer will be important to securing a viable mixed-use quarter that can respond to market demand and occupier requirements over the Plan period. However, our Client continues to object to Criterion 9 of Policy S/C/LCR, which requires redevelopment to:

> *"re-provide the existing quantum of floorspace for industrial and storage uses through the use of an intensified built form and the strategic co-location of complementary planning uses".*

The existing Industrial Estate accommodates a broad range of light industrial, general industrial, storage, distribution, trade counter, leisure and sui generis uses. Many of these businesses rely on dedicated servicing areas, vehicle access, parking, operational flexibility and, in some cases, activities which may not be compatible with residential development or a high-density mixed-use environment. A requirement to re-provide the existing quantum of industrial and storage floorspace is onerous and gives no meaningful consideration to the operational requirements of B2 and B8 uses, market demand and whether particular uses are compatible with new residential, leisure or cultural uses and the ability to deliver the wider objectives of the Allocation.

The proposed mix of homes, cultural facilities, leisure, employment floorspace, public realm and strategic transport infrastructure creates competing demands for a finite amount of land. Requiring the full existing industrial and storage quantum to be replicated would prevent the balanced, mixed-use redevelopment sought by the policy. The policy should instead support the retention or reprovision of employment floorspace where this is viable, deliverable and compatible with the overall development strategy. It should allow the appropriate employment mix and quantum to be established through up-to-date market, viability, design and amenity evidence at planning application stage.

Furthermore, it should be noted that a number of existing occupiers at Clifton Road Industrial Estate (circa 18 existing tenants) operate from more than one location within Cambridge. In this context, the existing employment uses on the Site are not locationally dependent. The potential

loss of such uses should be considered having regard to the need to optimise the Site for more appropriate uses in this highly sustainable location adjacent to the railway station.

Our Client seeks amendments to the draft wording of the Allocation to future-proof the Site from market changes, whilst providing compatible uses with residential development. As such, Criterion 9 of draft Policy S/C/LCR is proposed to be amended as follows:

> *"Redevelopment of the site should provide an appropriate range and quantum of employment floorspace, including light industrial, storage and other commercial uses, where demonstrated to be viable, deliverable and compatible with the proposed mixed-use development."*

Royal Mail Depot & Access Arrangements

Our Client recognises the need for redevelopment to take account of the operation of the Royal Mail depot, and redevelopment should not create unacceptable restrictions on the lawful operation of the depot. However, there is a clear distinction between safeguarding Royal Mail's operational requirements and requiring those requirements to be accommodated at the expense of delivering a comprehensive and well-designed redevelopment.

The current Spatial Framework identifies a servicing route for the Royal Mail depot through the centre of the Allocation. This approach raises significant concerns as it effectively embeds an existing industrial servicing function within the heart of a proposed mixed-use neighbourhood. The route would introduce regular HGV movements into areas intended for mixed-use residential and employment development, active travel connections, public realm and green infrastructure, creating an inherent conflict between industrial servicing operations and the creation of a safe, attractive and pedestrian-focused environment.

Furthermore, given the nature of Royal Mail operations, including early morning, late evening and potentially 24-hour servicing activity, the routing of depot traffic through the centre of the development has the potential to create ongoing conflicts between HGV movements and the operation of new public spaces, pedestrian routes and active frontages. Such an arrangement risks prejudicing the delivery of the high-quality, connected and people-focused urban environment that the Allocation seeks to achieve.

The policy should therefore avoid prescribing a fixed alignment for Royal Mail servicing access. Instead, it should require that any access solution is informed by robust transport, operational and masterplanning evidence and follows the principle of minimising impacts on the development potential, design quality and placemaking objectives of the Allocation. Where practicable and operationally feasible, servicing arrangements should be redirected to the periphery of the redevelopment rather than routed through the central parts of the mixed-use development.

Eastern Station Entrance

Our Client supports the principle of an appropriate eastern entrance to Cambridge Railway Station and remains committed to ensuring that redevelopment of the Site does not prejudice its delivery. However, it is noted that the Regulation 19 Policies Map (extract included at **Figure 3.0** below) identifies safeguarded land for East West Rail improvements and the eastern station entrance, which extends across a substantial part of the Clifton Road Site without justification.

Our Client is concerned that the draft Policy could lead to excessive safeguarding of developable land without sufficient clarity on the final location and footprint of the eastern entrance and its access requirements. Furthermore, limited details are known of the delivery programme of the eastern entrance including its planning process which will run independently to the Local Plan process in addition to the nature and scale of pick-up/ drop-off facilities.

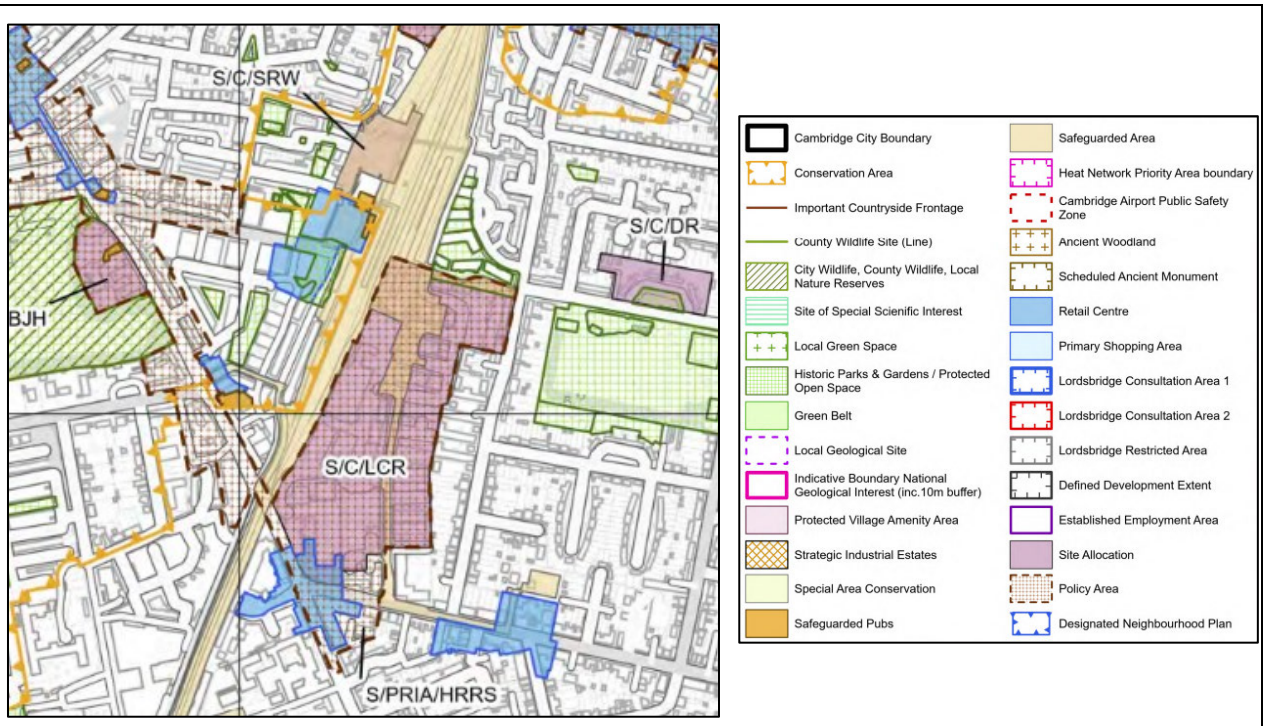


Figure 3.0: Extract of Greater Cambridge Local Plan Policy Map (Regulation 19)

Safeguarding should be based on robust and up-to-date evidence of the land genuinely required. It should not prevent reasonable interim or phased development where that development would not prejudice the evidenced delivery of the station entrance.

Accordingly, our Client requests the following amendments to the draft wording of Criterions 17 and 26(a) of Policy S/C/LCR:

> *"17. Development proposals must have regard to the evidenced land requirements of the preferred East West Rail route alignment and associated rail infrastructure, including a possible future eastern entrance to Cambridge railway station including access requirements which meet active travel principles. Safeguarding must be limited to land demonstrated to be necessary through robust and up-to-date evidence and should not prevent reasonable interim or phased development which would not prejudice delivery of the confirmed infrastructure."*
>
> *"26. Safeguarding land for and directly delivering the following physical transport measures within the site, demonstrated through robust and up-to-date evidence:*
>
> *a. A possible eastern entrance to Cambridge railway station and associated essential infrastructure which meet active travel principles- this should include evidence of the possibility and feasibility of providing an unpaid pedestrian link over the railway as part of the station design. Interim and phased development should be supported where it would not prejudice delivery of the confirmed station proposals."*

Movement and Transport

Our Client supports the objective of promoting walking, wheeling, cycling and public transport. The Site's highly accessible location provides an opportunity to deliver a low-car development with significant improvements to active travel connections.

However, it is noted that draft Policy S/C/LCR contains an extensive range of transport requirements, with Criterion 28 introducing the need for a Strategic and Local Transport Mitigation

Plan. Notwithstanding, the draft policy fails to identify who is responsible for preparing the Mitigation Plan and how the costs of identified measures will be apportioned.

The Transport Mitigation Plan must not become another mandatory site-wide approval stage which prevents individual parcels from progressing. It should be capable of being prepared, supplemented or updated in support of individual planning applications and phases. Where a planning application demonstrates an acceptable transport strategy, provides proportionate mitigation for its effects and does not prejudice the future development of the Allocation, the absence of a completed site-wide mitigation plan should not prevent permission being granted.

In light of the above, our Client suggests Criterion 28 of draft Policy S/C/LCR is amended as follows:

> *"A proportionate transport strategy or mitigation plan should support development proposals. The scope of the strategy or plan should reflect the scale, nature and effects of the development proposed and may be prepared or updated on a phased or planning application basis.*
>
> *The strategy should demonstrate how the proposal contributes to the wider movement objectives for the Allocation, provides the mitigation necessary to address its effects and does not materially prejudice the future development of adjoining land. The absence of a completed site-wide Strategic and Local Transport Mitigation Plan should not prevent an otherwise acceptable planning application from coming forward."*

Building Heights

Our Client supports a context-led design approach and agrees that building height, scale and massing should respond appropriately to the Site's townscape and heritage context. Specifically, our Client welcomes supporting paragraph 3.1.5 which notes the significant potential to capitalise on the site's highly sustainable location close to Cambridge railway station and bus interchange and rebalance development either side of Cambridge railway station.

The Cambridge Tall Buildings Baseline, Strategy and Guidance (June 2026) indicates that development within the Clifton Road Allocation should generally remain below the 19-metre tall building threshold, while individual, finely grained development up to 25.5 metres may be permissible in the central part of the area where testing demonstrates no detrimental effect on views towards the historic core skyline. The guidance does not recommend development significantly above 25.5 metres because of potential effects on historic skyline views and cumulative urbanising effects.

Notwithstanding, Criterion 20 of draft Policy S/C/LCR requires proposals greater than three commercial storeys within Clifton Road Industrial Estate, or taller than six residential storeys within the Cambridge Leisure part of the Allocation, to provide additional justification through accurate 3D modelling and a comprehensive landscape and visual impact assessment. Given the CB1 development on the western side of the railway spans up to seven commercial storeys, the effect of this wording applies additional townscape and design scrutiny at an unreasonably low threshold.

The policy should positively recognise that a significant degree of intensification will be necessary if the Allocation is to fulfil its regeneration objectives and make the most effective use of this highly sustainable brownfield site adjacent to the Station. The Site represents one of the most accessible locations in Greater Cambridge and is precisely the type of location where national policy seeks to direct growth. The Government has recently strengthened national policy support for development around railway stations, recognising such locations as critical opportunities to accommodate growth in the most sustainable manner. The clear direction of travel within national policy is towards greater density and more intensive development around public transport nodes, rather than the imposition of arbitrary constraints on building height and capacity.

Notably, Part 1) of NPPF (2026) Policy L3: Achieving appropriate densities, states '*Development proposals should make efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places.'*

In addition, Part 2 C) of NPPF Policy L3 requires minimum development densities for residential or mixed-use schemes which are within reasonable walking distance of a well-connected station. Part 3 confirms minimum densities should be exceeded where possible, especially in areas of high connectivity, to optimise the efficient use of land. Finally, Part 4 stipulates that "*Development proposals that do not make efficient use of land in accordance with paragraph 2 of this policy should be refused*".

Against this national policy context, criterion 20 of draft Policy S/C/LCR fails to promote the optimisation of a highly accessible brownfield site and is therefore inconsistent with the NPPF's objective of making effective use of land. Furthermore, such an approach is contrary to the policy's simultaneous expectations for the re-provision of employment floorspace, the delivery of new homes, significant public realm improvements, green infrastructure, and the safeguarding of land for station-related infrastructure. The cumulative effect is to require substantial development outcomes whilst artificially limiting the scale of development capable of delivering them. As such, our Client considers that the threshold for enhanced assessment should be increased to more than five commercial storeys and more than seven residential storeys. Development exceeding those thresholds should not be discouraged in principle provided it is supported by robust design, townscape and heritage evidence and can be demonstrated to respond appropriately to its context. Rather, the policy should positively support well-designed intensification, where it responds appropriately to surrounding townscape and heritage sensitivities, in a location where National Policy clearly supports higher-density development.

With regards to the above, our Client seeks modifications to Criterion 20 of draft Policy S/C/LCR as follows:

> *"Proposals should make efficient use of this highly accessible previously developed site through an appropriate intensification of built form. Proposals greater than five commercial storeys or taller than seven residential storeys should demonstrate a positive contribution to the Cambridge skyline, justified through accurate 3D modelling and comprehensive landscape and visual impact assessment. Taller development may be acceptable where justified by high-quality design and where it responds appropriately to surrounding townscape and heritage sensitivities, having regard to the Council's Tall Buildings Guidance."*

Site-Wide Energy and Heat Networks

Our Client supports the principle of low-carbon energy generation and the investigation of opportunities to connect development to wider heat networks. However, Criterion 29 of the draft Policy should recognise that the separate parcels within the Allocation may come forward at different times, and therefore a site-wide decentralised energy solution may not be technically, commercially or operationally available when an individual development parcel is ready to proceed.

The absence of a site-wide solution should not prevent an individual parcel from being delivered where that proposal demonstrates an appropriate standalone low-carbon energy strategy and does not prejudice a reasonable future connection.

Accordingly, our Client seeks modifications to the wording of Criterion 29 of draft Policy S/C/LCR as follows:

"Development proposals should assess opportunities for decentralised energy generation and storage and, where feasible and viable, connections to wider heat networks. A site-wide approach should be encouraged where it is technically and commercially deliverable. The absence of a site-wide energy solution should not prevent the delivery of an individual development parcel where an appropriate standalone low-carbon energy strategy is demonstrated, and the proposal does not unreasonably prejudice future connections."

Please provide a 100 word summary of your representation.

Draft Policy S/C/LCR does not adequately recognise the separate landownerships, different development objectives or delivery programmes across the Allocation. The policy proposes a significantly more detailed set of masterplanning, transport, infrastructure, employment and design requirements which will frustrate the delivery of the allocation.

The draft policy will delay development, constrain the ability of individual land interests to come forward. Without modifications to introduce greater flexibility, support phased delivery and ensure that infrastructure and mitigation requirements are fairly and proportionately apportioned, the policy is unsound given it hasn't been positively prepared, it is not justified, effective or consistent with National Policy.

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 see enclosed full Representations prepared by Montagu Evans on behalf of Universities Superannuation Scheme (dated 24th September 2026).

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.

Our client objects to the draft wording of Policy S/C/LCR and requests a number of amendments to the policy wording which are detailed below.

Masterplan-Led Development

Our Client supports the principle of coordinated redevelopment and agrees that proposals should positively contribute to the wider objectives of the Allocation. A framework which establishes broad design, movement and infrastructure principles is appropriate for a site of this scale and strategic importance. However, our Client objects to the requirement in Criterion 3 of draft Policy S/C/LCR that:

"The masterplan should be agreed by the Council prior to the approval of any planning applications."

The Regulation 18 policy sought a masterplan-led approach which ensured coordination with adjoining development. The Regulation 19 policy goes materially further by requiring a site-wide masterplan covering the wider Allocation and requiring that masterplan to be agreed by the Council before any planning application is approved.

The Allocation includes several distinct landownerships and established operational uses. There is no certainty that all landowners will agree a detailed masterplan and delivery arrangements, let alone at the same time, or more importantly, prior to an application being determined by the Local Planning Authority. As such, the draft policy has the potential to make the delivery of one parcel dependent upon the agreement of third-party landowners, which could delay investment and regeneration of the site.

With regards to the future eastern station entrance, these proposals will be submitted as a Development Consent Order and assessed by the Planning Inspectorate. Whilst the Council will play an important role in the DCO as a host authority, it will not be in control of timescales or the decision-making process. As currently drafted, there is a genuine risk that development on individual parcels could therefore become contingent upon matters outside the control of our Client and the Council, resulting in delay, increased cost and uncertainty.

Furthermore, the requirement to agree a masterplan with the Council and other landowners prior to approval <u>of any planning application</u> reduces the ability of longer-term proposals to respond to changing commercial, occupational and infrastructure circumstances. It should be noted that Land Securities are currently in the process of selling the Cambridge Leisure site, which to the best of our knowledge, has received interest from investors seeking to retain the Leisure Park in its current form. Given this portion of the allocation is unlikely to come forward until the longer-term, fixing the masterplan at this stage will create an in-flexible policy framework for future development.

In light of the above, instead of a mandatory site-wide masterplan, we suggest individual proposals should demonstrate compliance with an agreed set of strategic design and development principles. These development principles would address matters such as land-use relationships, movement corridors, public realm, infrastructure interfaces and the avoidance of prejudice to adjoining land. This would secure appropriate coordination without requiring detailed agreement across landownerships that may progress at different times.

The policy should also expressly recognise that development may be delivered in phases and that an individual parcel may come forward independently where the proposal:

- complies with the strategic principles for the wider Allocation;
- provides an appropriate relationship with existing and future adjoining development;
- delivers or contributes proportionately towards the infrastructure necessary for that phase;
- does not prejudice the reasonable future development of adjoining land; and
- demonstrates that the proposal is acceptable on its own planning merits.

With consideration to the above, our Client seeks amendments to Criterion 3 of draft Policy S/C/LCR to ensure that the absence of an agreed detailed masterplan for the whole Allocation does not prevent the approval of an otherwise acceptable planning application. Accordingly, Criterion 3 is proposed to be amended on as follows:

> *"A set of site-wide strategic design and development principles should be prepared by the landowners/ promoters in conjunction with the Council and following proportionate engagement with relevant stakeholders. The principles should have regard to the indicative Spatial Framework shown at Figure 13 and will need to identify the broad distribution of land uses, infrastructure delivery and anticipated phasing.*
>
> *Development may come forward on a phased or parcel-by-parcel basis. Planning applications should demonstrate how the proposed development responds positively to the strategic principles and wider objectives of the Allocation and does not unreasonably prejudice the future development of adjoining land."*

Phasing of Development

Our Client welcomes Criterion 5 of draft Policy S/C/LCR which recognises that development proposals may be delivered on a phased approach. However, this is not carried consistently through the remainder of the policy, which implies that the Allocation will be planned, funded and delivered as a single comprehensive project.

The Policy should recognise that different land parcels will be subject to different issues, viability considerations, lease and vacant possession timings and delivery timescales. It is counterintuitive to bring forward a large site in multiple ownership on a basis that requires an individual landowner to resolve every site-wide matter before bringing forward a planning application on its own. Nor should a planning application be delayed solely because neighbouring land is not being actively promoted nor an agreement reached with every adjoining owner.

Accordingly, our Client requests the following amendments to criterion 5 of draft Policy S/C/LCR:

> *"Development proposals, including those being delivered as individual parcels or using a phased approach, must positively contribute to the wider development objectives for Land at Clifton Road in line with the principles identified in the indicative Spatial Framework diagram (Figure 13), and they must not prejudice the potential future redevelopment of adjacent sites. The absence of redevelopment proposals or agreement from other landowners within the Allocation should not, in itself, prevent an otherwise acceptable development from coming forward."*

Apportionment of Infrastructure

The Regulation 19 draft Policy S/C/LCR introduces a substantial range of infrastructure, mitigation, safeguarding and financial requirements. These include measures relating to the safeguarding of the eastern station entrance, the Chisholm Trail, cycle parking, mobility hubs, public realm, transport mitigation, pick-up and drop-off facilities, servicing, monitoring and wider station-area

infrastructure. Whilst our Client recognises that development should make appropriate contributions towards infrastructure, the policy must ensure that obligations are fairly and reasonably related to the scale, nature and effects of the development proposed and apportioned to elements of the overall allocation-not a first past the post approach.

The current policy is not clear regarding which land should be safeguarded for the identified 'physical transport measures', the evidence supporting the extent of that safeguarding, the mechanisms through which infrastructure costs will be apportioned between development parcels, or how the policy will avoid an early development parcel carrying a disproportionate share of site-wide costs.

No development parcel should be required to provide or fund infrastructure purely because it is the first part of the Allocation to come forward. In particular, a parcel should not be required to deliver strategic infrastructure that is not necessary to make that development acceptable in planning terms, or which principally serves other land, the wider station area or later phases. Infrastructure requirements should be supported by robust evidence and should be proportionate to the impacts generated by each development.

In light of the above, our Client requests the following additional wording to draft Policy S/C/LCR relating to the apportionment of infrastructure:

> *"Infrastructure, mitigation measures and financial contributions will be apportioned fairly and proportionately between development parcels, having regard to the scale, nature and impacts of the development proposed and the degree to which each parcel benefits from the relevant infrastructure.*
> *An individual proposal will not be required to deliver or fund infrastructure which is not necessary to make that proposal acceptable in planning terms."*

Employment and Industrial Floorspace

Our Client continues to support the inclusion of a range of employment uses within the Allocation. A flexible commercial offer will be important to securing a viable mixed-use quarter that can respond to market demand and occupier requirements over the Plan period. However, our Client continues to object to Criterion 9 of Policy S/C/LCR, which requires redevelopment to:

> *"re-provide the existing quantum of floorspace for industrial and storage uses through the use of an intensified built form and the strategic co-location of complementary planning uses".*

The existing Industrial Estate accommodates a broad range of light industrial, general industrial, storage, distribution, trade counter, leisure and sui generis uses. Many of these businesses rely on dedicated servicing areas, vehicle access, parking, operational flexibility and, in some cases, activities which may not be compatible with residential development or a high-density mixed-use environment. A requirement to re-provide the existing quantum of industrial and storage floorspace is onerous and gives no meaningful consideration to the operational requirements of B2 and B8 uses, market demand and whether particular uses are compatible with new residential, leisure or cultural uses and the ability to deliver the wider objectives of the Allocation.

The proposed mix of homes, cultural facilities, leisure, employment floorspace, public realm and strategic transport infrastructure creates competing demands for a finite amount of land. Requiring the full existing industrial and storage quantum to be replicated would prevent the balanced, mixed-use redevelopment sought by the policy. The policy should instead support the retention or reprovision of employment floorspace where this is viable, deliverable and compatible with the overall development strategy. It should allow the appropriate employment mix and quantum to be established through up-to-date market, viability, design and amenity evidence at planning application stage.

Furthermore, it should be noted that a number of existing occupiers at Clifton Road Industrial Estate (circa 18 existing tenants) operate from more than one location within Cambridge. In this context, the existing employment uses on the Site are not locationally dependent. The potential loss of such uses should be considered having regard to the need to optimise the Site for more appropriate uses in this highly sustainable location adjacent to the railway station.

Our Client seeks amendments to the draft wording of the Allocation to future-proof the Site from market changes, whilst providing compatible uses with residential development. As such, Criterion 9 of draft Policy S/C/LCR is proposed to be amended as follows:

> *"Redevelopment of the site should provide an appropriate range and quantum of employment floorspace, including light industrial, storage and other commercial uses, where demonstrated to be viable, deliverable and compatible with the proposed mixed-use development."*

Royal Mail Depot & Access Arrangements

Our Client recognises the need for redevelopment to take account of the operation of the Royal Mail depot, and redevelopment should not create unacceptable restrictions on the lawful operation of the depot. However, there is a clear distinction between safeguarding Royal Mail's operational requirements and requiring those requirements to be accommodated at the expense of delivering a comprehensive and well-designed redevelopment.

The current Spatial Framework identifies a servicing route for the Royal Mail depot through the centre of the Allocation. This approach raises significant concerns as it effectively embeds an existing industrial servicing function within the heart of a proposed mixed-use neighbourhood. The route would introduce regular HGV movements into areas intended for mixed-use residential and employment development, active travel connections, public realm and green infrastructure, creating an inherent conflict between industrial servicing operations and the creation of a safe, attractive and pedestrian-focused environment.

Furthermore, given the nature of Royal Mail operations, including early morning, late evening and potentially 24-hour servicing activity, the routing of depot traffic through the centre of the development has the potential to create ongoing conflicts between HGV movements and the operation of new public spaces, pedestrian routes and active frontages. Such an arrangement risks prejudicing the delivery of the high-quality, connected and people-focused urban environment that the Allocation seeks to achieve.

The policy should therefore avoid prescribing a fixed alignment for Royal Mail servicing access. Instead, it should require that any access solution is informed by robust transport, operational and masterplanning evidence and follows the principle of minimising impacts on the development potential, design quality and placemaking objectives of the Allocation. Where practicable and operationally feasible, servicing arrangements should be redirected to the periphery of the redevelopment rather than routed through the central parts of the mixed-use development.

Eastern Station Entrance

Our Client supports the principle of an appropriate eastern entrance to Cambridge Railway Station and remains committed to ensuring that redevelopment of the Site does not prejudice its delivery. However, it is noted that the Regulation 19 Policies Map (extract included at **Figure 3.0** below) identifies safeguarded land for East West Rail improvements and the eastern station entrance, which extends across a substantial part of the Clifton Road Site without justification.

Our Client is concerned that the draft Policy could lead to excessive safeguarding of developable land without sufficient clarity on the final location and footprint of the eastern entrance and its access requirements. Furthermore, limited details are known of the delivery programme of the

eastern entrance including its planning process which will run independently to the Local Plan process in addition to the nature and scale of pick-up/ drop-off facilities.

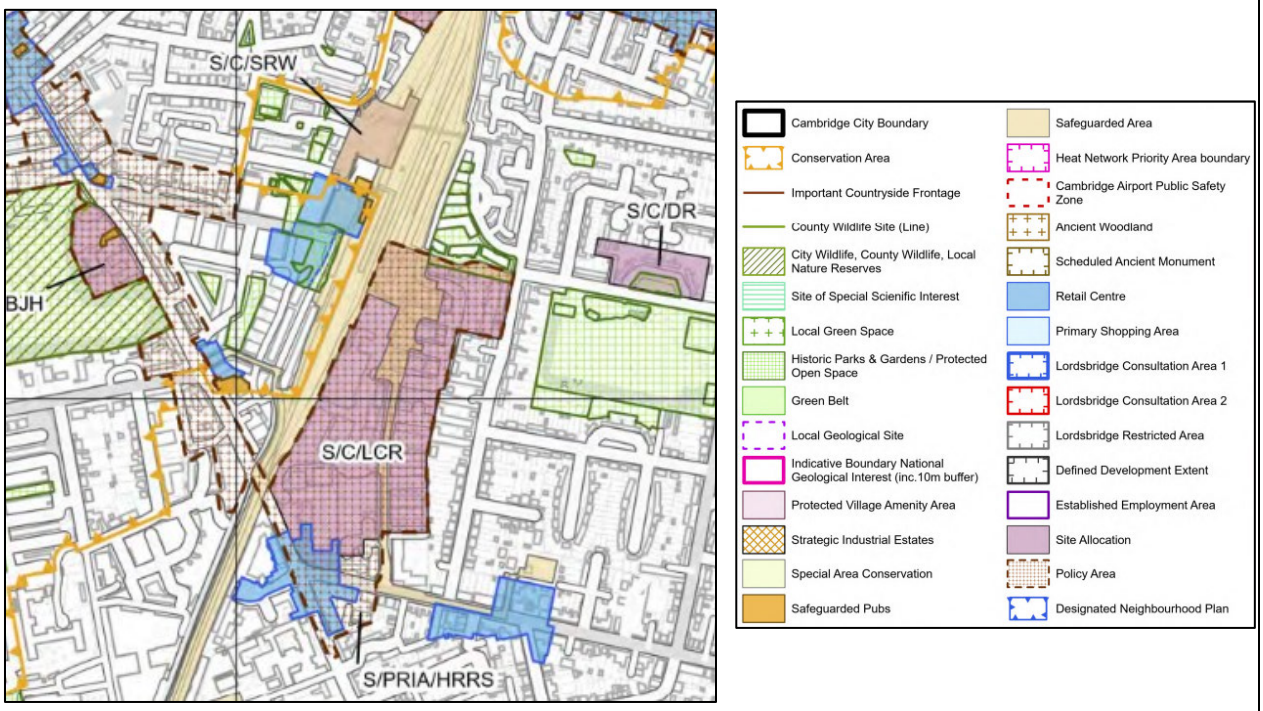


Figure 3.0: Extract of Greater Cambridge Local Plan Policy Map (Regulation 19)

Safeguarding should be based on robust and up-to-date evidence of the land genuinely required. It should not prevent reasonable interim or phased development where that development would not prejudice the evidenced delivery of the station entrance.

Accordingly, our Client requests the following amendments to the draft wording of Criterions 17 and 26(a) of Policy S/C/LCR:

> *"17. Development proposals must have regard to the evidenced land requirements of the preferred East West Rail route alignment and associated rail infrastructure, including a possible future eastern entrance to Cambridge railway station including access requirements which meet active travel principles. Safeguarding must be limited to land demonstrated to be necessary through robust and up-to-date evidence and should not prevent reasonable interim or phased development which would not prejudice delivery of the confirmed infrastructure."*
>
> *"26. Safeguarding land for and directly delivering the following physical transport measures within the site, demonstrated through robust and up-to-date evidence:*
>
> *b. A possible eastern entrance to Cambridge railway station and associated essential infrastructure which meet active travel principles- this should include evidence of the possibility and feasibility of providing an unpaid pedestrian link over the railway as part of the station design. Interim and phased development should be supported where it would not prejudice delivery of the confirmed station proposals."*

Movement and Transport

Our Client supports the objective of promoting walking, wheeling, cycling and public transport. The Site's highly accessible location provides an opportunity to deliver a low-car development with significant improvements to active travel connections.

However, it is noted that draft Policy S/C/LCR contains an extensive range of transport requirements, with Criterion 28 introducing the need for a Strategic and Local Transport Mitigation Plan. Notwithstanding, the draft policy fails to identify who is responsible for preparing the Mitigation Plan and how the costs of identified measures will be apportioned.

The Transport Mitigation Plan must not become another mandatory site-wide approval stage which prevents individual parcels from progressing. It should be capable of being prepared, supplemented or updated in support of individual planning applications and phases. Where a planning application demonstrates an acceptable transport strategy, provides proportionate mitigation for its effects and does not prejudice the future development of the Allocation, the absence of a completed site-wide mitigation plan should not prevent permission being granted.

In light of the above, our Client suggests Criterion 28 of draft Policy S/C/LCR is amended as follows:

> *"A proportionate transport strategy or mitigation plan should support development proposals. The scope of the strategy or plan should reflect the scale, nature and effects of the development proposed and may be prepared or updated on a phased or planning application basis.*
>
> *The strategy should demonstrate how the proposal contributes to the wider movement objectives for the Allocation, provides the mitigation necessary to address its effects and does not materially prejudice the future development of adjoining land. The absence of a completed site-wide Strategic and Local Transport Mitigation Plan should not prevent an otherwise acceptable planning application from coming forward."*

Building Heights

Our Client supports a context-led design approach and agrees that building height, scale and massing should respond appropriately to the Site's townscape and heritage context. Specifically, our Client welcomes supporting paragraph 3.1.5 which notes the significant potential to capitalise on the site's highly sustainable location close to Cambridge railway station and bus interchange and rebalance development either side of Cambridge railway station.

The Cambridge Tall Buildings Baseline, Strategy and Guidance (June 2026) indicates that development within the Clifton Road Allocation should generally remain below the 19-metre tall building threshold, while individual, finely grained development up to 25.5 metres may be permissible in the central part of the area where testing demonstrates no detrimental effect on views towards the historic core skyline. The guidance does not recommend development significantly above 25.5 metres because of potential effects on historic skyline views and cumulative urbanising effects.

Notwithstanding, Criterion 20 of draft Policy S/C/LCR requires proposals greater than three commercial storeys within Clifton Road Industrial Estate, or taller than six residential storeys within the Cambridge Leisure part of the Allocation, to provide additional justification through accurate 3D modelling and a comprehensive landscape and visual impact assessment. Given the CB1 development on the western side of the railway spans up to seven commercial storeys, the effect of this wording applies additional townscape and design scrutiny at an unreasonably low threshold.

The policy should positively recognise that a significant degree of intensification will be necessary if the Allocation is to fulfil its regeneration objectives and make the most effective use of this highly sustainable brownfield site adjacent to the Station. The Site represents one of the most accessible locations in Greater Cambridge and is precisely the type of location where national policy seeks to direct growth. The Government has recently strengthened national policy support for development around railway stations, recognising such locations as critical opportunities to accommodate growth in the most sustainable manner. The clear direction of travel within national

policy is towards greater density and more intensive development around public transport nodes, rather than the imposition of arbitrary constraints on building height and capacity.

Notably, Part 1) of NPPF (2026) Policy L3: Achieving appropriate densities, states '*Development proposals should make efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places.'*

In addition, Part 2 C) of NPPF Policy L3 requires minimum development densities for residential or mixed-use schemes which are within reasonable walking distance of a well-connected station. Part 3 confirms minimum densities should be exceeded where possible, especially in areas of high connectivity, to optimise the efficient use of land. Finally, Part 4 stipulates that "*Development proposals that do not make efficient use of land in accordance with paragraph 2 of this policy should be refused*".

Against this national policy context, criterion 20 of draft Policy S/C/LCR fails to promote the optimisation of a highly accessible brownfield site and is therefore inconsistent with the NPPF's objective of making effective use of land. Furthermore, such an approach is contrary to the policy's simultaneous expectations for the re-provision of employment floorspace, the delivery of new homes, significant public realm improvements, green infrastructure, and the safeguarding of land for station-related infrastructure. The cumulative effect is to require substantial development outcomes whilst artificially limiting the scale of development capable of delivering them. As such, our Client considers that the threshold for enhanced assessment should be increased to more than five commercial storeys and more than seven residential storeys. Development exceeding those thresholds should not be discouraged in principle provided it is supported by robust design, townscape and heritage evidence and can be demonstrated to respond appropriately to its context. Rather, the policy should positively support well-designed intensification, where it responds appropriately to surrounding townscape and heritage sensitivities, in a location where National Policy clearly supports higher-density development.

With regards to the above, our Client seeks modifications to Criterion 20 of draft Policy S/C/LCR as follows:

> *"Proposals should make efficient use of this highly accessible previously developed site through an appropriate intensification of built form. Proposals greater than five commercial storeys or taller than seven residential storeys should demonstrate a positive contribution to the Cambridge skyline, justified through accurate 3D modelling and comprehensive landscape and visual impact assessment. Taller development may be acceptable where justified by high-quality design and where it responds appropriately to surrounding townscape and heritage sensitivities, having regard to the Council's Tall Buildings Guidance."*

Site-Wide Energy and Heat Networks

Our Client supports the principle of low-carbon energy generation and the investigation of opportunities to connect development to wider heat networks. However, Criterion 29 of the draft Policy should recognise that the separate parcels within the Allocation may come forward at different times, and therefore a site-wide decentralised energy solution may not be technically, commercially or operationally available when an individual development parcel is ready to proceed.

The absence of a site-wide solution should not prevent an individual parcel from being delivered where that proposal demonstrates an appropriate standalone low-carbon energy strategy and does not prejudice a reasonable future connection.

Accordingly, our Client seeks modifications to the wording of Criterion 29 of draft Policy S/C/LCR as follows:

> *"Development proposals should assess opportunities for decentralised energy generation and storage and, where feasible and viable, connections to wider heat networks. A site-wide approach should be encouraged where it is technically and commercially deliverable. The absence of a site-wide energy solution should not prevent the delivery of an individual development parcel where an appropriate standalone low-carbon energy strategy is demonstrated, and the proposal does not unreasonably prejudice future connections."*

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.

To discuss any proposed modifications to draft Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)', of which our Client owns land at Clifton Road Industrial Estate and 60-62 Clifton Road, Cambridge, CB1 7ED.

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