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Greater Cambridge Shared Planning Service

Via Email

Dear Sir/Madam,

GREATER CAMBRIDGE PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT - CONSULTATION RESPONSE

This representation has been prepared on behalf of Wrenbridge Land Limited (hereafter 'Wrenbridge') in response to the Greater Cambridge Planning Obligation Supplementary Planning Document (SPD) consultation closing 17 October 2025.

Wrenbridge has delivered several successful commercial schemes across Greater Cambridge including recently at Lockton House, with other recent permissions at Clarendon House and Mercers Row.

Wrenbridge also maintain future land interests for developments across Greater Cambridge, they are therefore well placed to provide a response to the draft SPD, particularly in relation to commercial development and obligations.

Consultation Response

Below sets out our consultation response structured by the relevant chapters within the consultation document.

This feedback is set out with the Community Infrastructure Levy 122 statutory tests in mind, which state obligations can only be sought where they meet the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development;
- Fairly and reasonably related in scale and kind to the development.

This test is also enshrined in paragraph 58 of the National Planning Policy Framework.

Chapter 7: Community Facilities

The need for all major commercial development to provide or contribute towards community facilities is unclear (introduced at paragraph 7.10). Paragraph 7.13 goes onto explain that commercial developments of greater than 5,000m² will be required to 'consider' how the needs of workers and visitors will be met in relation to social and leisure facilities. If the need is not met via existing or new on-site facilities and contribution will be sought to address the impact.



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It is not clear whether at paragraph 7.13 'existing or new on site-facilities' means existing facilities on-site or whether this can include a review of existing facilities within the general area. The paragraph should be re-written to clarify this point. It could be re-written to state: *If the need cannot be met through existing facilities on-site, in the surrounding area or new on-site facilities [...]*. This provides the necessary clarification, with the pre-application process used to agree the scope of review ahead of a planning submission.

However, should the 'existing' wording relate solely to on-site facilities then the following feedback is provided.

It is not a sound approach to require all commercial developments of greater than 5,000m² provide new on-site facilities if they do not benefit from existing facilities. New commercial development may support existing community facilities in their wider area by helping ensure their viability (ie: new customers for existing public houses).

Chapter 14: Public Open Space & Chapter 15: Indoor Sports, Including Swimming

The same comments are made on these sections as for chapter 7 above. The reference to 'existing' in paragraph 14.8 and 15.5 should be made clearer, that it also refers to a review of provision within the wider area.

Chapter 20: Planning Obligations to Support Affordable Workspace

It is important to set out the purpose of SPDs in terms of decision making. The National Planning Policy Framework defines them as:

'Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.'

The key strand of this is that SPDs add further details to policies in the development plan. They should not be used to create in effect create new policies that have not been through the scrutiny of the Local Plan process.

This is further elaborated upon in the Plan-Making Planning Practice Guidance and also add that they should not add unnecessarily to the financial burden of development. Whilst The Town and Country Planning (Local Planning) (England) Regulations 2012 at Part 4, Regulation 8, Limb (3) states that SPDs must not conflict with the adopted development plan.

This is important to draw out as the Council acknowledge at paragraph 20.4, neither development plan contain policies relating to affordable workspace.

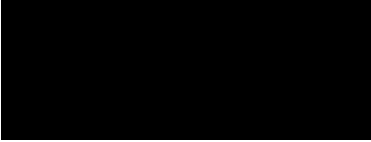
The introduction of such an obligation or potential requirement may have a significant impact on the viability of commercial developments across Greater Cambridge, which has not been subject the scrutiny of Local Plan Examination. Nor does it appear any in-depth evidence has been prepared to support the 10% of floorspace aspiration including viability assessments, rather the Council has lifted a similar approach from the London Plan.

Until such time as a future policy is subject to a fully evidenced approach that is scrutinised via the Local Plan process, we believe that this chapter should be removed from the SPD entirely. The SPD can then be updated in the future in this regard (if necessary) once a new Local Plan is adopted.

Summary

I hope the above is clear, however, should you have any questions, please do not hesitate to get in touch.

Kind regards,



Gareth Pritchard
Partner