

MILLS & REEVE



Planning in Cambridgeshire

Tuesday 27 January 2026

Chair's introduction: Two big questions for planning in Cambridgeshire 2026-27



Rupert Warren KC
Landmark Chambers



2026-27 and beyond in Cambridgeshire

Ever more intensive focus on Cambridgeshire – economic importance, role of CGC, ability to show deliverables in the Parliament

Delivery will only happen with consents and viability/investment return

Consenting needs simplicity and speed: plans that work; infrastructure that does not hold up consents or implementation; decision-making that is clear

Investment decisions rely on that greater certainty and also on schemes being viable in the market



Plans that work

- Geographies and responsibilities/power
- GCLP – 2026-27
- Mayoral Growth Plan and SDS (2025; 2027/8(?))
- CGC and potential Dev Co 2026
- Corridor region ideas 2027(?)
- MHCLG – call in/recovery - ongoing
- NISTA – Infrastructure planning and delivery (?)



Framework for collaboration?

- Do we need a written understanding of who will do what, when? Role for Central Govt in setting this clearly?
- Perspectives of different stakeholders different?
- What role will the new NPPF 2026 play in this – see for instance the draft transitional provisions in Annex A?
- How will plans or plans/programmes be tested for viability of their key proposals?
- How in particular will the GCLP, Mayoral strategy and the Dev Co (including its evidence base) articulate?



Delivery/viability/investment

- Infrastructure first (or at least, its delivery identified/secured first)
- Role of NISTA: the June 2025 UK Infrastructure Strategy para 1.37 includes these two statements:

“The government will oversee the development of spatial plans for key infrastructure sectors, improving alignment between them and ensuring they respond to local ambitions and national goals”

“Spatial Development Strategies will identify infrastructure needs and coordinate delivery to support a range of place-based objectives...”

- The sequencing of this (highly sensible) work will be important



Two big questions for the day

- How will the process of collaboration between MHCLG, Dev Co/CGC, Mayor and GCPS work in 2026-27 and beyond?
- What key outcomes can we achieve to increase the likelihood of inward investment and growth in the sub-region over that time?



NPPF and Local Plan-Making



Melissa Murphy KC
Landmark Chambers



Overview:

Plan-making in transition

1. A transition: the basis of examination
2. Draft NPPF 2025 plan-making: themes
3. Mayoral plan-making & local government re-organisation
4. New towns & prematurity



Transition: the basis of examination

NPPF 2023

- Existing procedural arrangements for examination
- NPPF/234 (12.3.2025 cut off for regulation 19 stage + criteria) – 2023 policy basis

NPPF 2024 (updated Feb 2025)

- Regulation 19 post 12.3.2025
- Submission by 31 December 2026
- Still “legacy plan-making” – 2024 policy

Draft NPPF 2025

- 2027 on: new plan making process
 - Spatial development strategy coverage?
 - 30 months all-in
 - 5 year review?



Draft NPPF 2025 plan-making: Themes

1. Centralisation – a suite of planning policies which applies across the country.
2. A more rules-based system?
3. Greater certainty in terms of timing?
4. More logical layers of plan-making, with spatial development strategy layer.



Centralisation (draft NPPF policies)

PM6: General principles for plan-making

1. All plan-makers should, in preparing plans:
 - c. Not duplicate, substantively restate or modify the content of national decision-making policies unless directed by other policies in this Framework;

PM13: Setting standards

1. Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements¹⁸, parking and design and placemaking, and where this will provide clarity and a high degree of certainty about the requirements that relevant development proposals are expected to meet. Such standards should:
 - b. Not cover matters which are already addressed by Building Regulations, other than in relation to:
 - i. accessibility standards, for which local standards in relation to requirement M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings) of the Building Regulations should be set in line with policy HO5; or
 - ii. water efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent local standard in areas of serious water stress.



A more rules-based system?

- Limit. Statutory decision making (section 70(2) and section 38(6)) – a balanced decision, see *Gladman v. Secretary of State* [2026] EWHC 51 (Admin) at [49].
- Greater certainty: e.g. viability, development around stations, Green Belt/Grey Belt, flood risk?



A more rules-based system for plan-making?

Draft NPPF 2025/PM2: content of local plans

- 10 measurable outcomes
- Spatial strategy, minimum amount of development, designations, allocations & broad locations for growth for 15* year period
- Intervention power (including for failure to make adequate progress)



A more rules-based system for plan-making?

Examination

Spatial development strategy PM14	Local plan PM15
Positive	Positive
Appropriate	Appropriate
Effective	Realistic
Consistent with national policy	Consistent with national policy
	Conformity



Timing: 30 months from Gateway 1; 5 year reviews



Layers of plan making: spatial development strategy

- Section 58 Planning and Infrastructure Act 2025 (not yet in force, envisaged June 2026, regulations awaited) – amends Planning and Compulsory Purchase Act 2004, to introduce e.g. new section 12D, specifying the contents of a spatial development strategy.
- Must include a statement of the strategic planning authority's policies (however expressed), in relation to the development and use of land in the strategy area, which are of strategic importance to that area
- May include e.g. strategically important infrastructure, amount/distribution of housing.



Draft NPPF 2025/PM1: content of the SDS

PM1: Spatial development strategies

1. Spatial development strategies should set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for investment and growth, including for new housing. Their content should be genuinely strategic in nature and allow for more detailed issues to be considered and addressed through other parts of the development plan.
- 20-year growth strategy, apportioning “objectively assessed needs for housing and other development”
 - Broad locations for strategic development
 - Spatial expression to Local Growth Plans & National Industry Strategy
 - Replace after 10 years (& alter every 5 years to reflect changes in housing requirements)



Mayoral plan-making

Cambridgeshire & Peterborough Combined Authority – timetable to SDS
(agenda item 21.1.2026)

- Envisaged that formal stages of plan preparation will begin in autumn 2026
- September committee cycle would (subject to Regulations being confirmed) agree the timescale for the SDS and its submission to government
- Logic – commencement of SDS powers & publication of NPPF

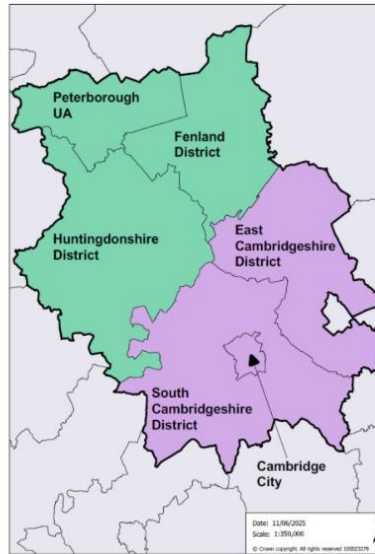


Local government re-organisation & devolution

Abolition of the two-tier system

Cambridgeshire timing:

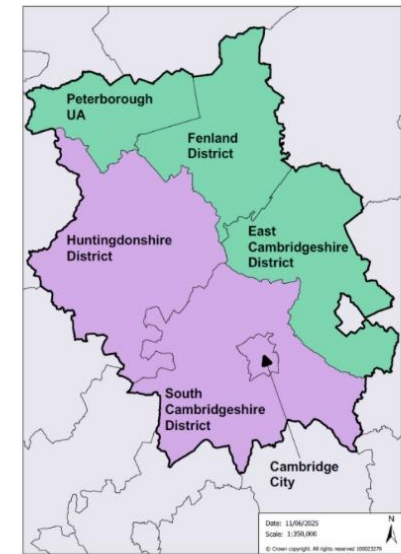
- 11.2025 submission
- Consultation Q1 2026
- Summer announcement
- 5.2027 shadow
- 4.2028 vesting (go live)



Proposal A



Proposal B



Proposal C



Greater Cambridge local plan – LDS/local plan timetable

Formal stages of GCLP timetable

Autumn/Winter 2025	Draft Plan Consultation (Reg 18)
Summer/Autumn 2026	Proposed Submission Plan Consultation (Reg 19)
Winter 2026 (by Dec 2026 as per current NPPF consultation)	Submission to Secretary of State for independent Examination (Reg 22)

- NB overlap of re-organisation timetable in 2026 – Options A & B include other local authorities.



New towns & prematurity

dNPPF 2025/HO13

4. Development proposals affecting sites for large scale residential and mixed-use development set out in emerging development plans should not be inconsistent with the proposed scale, location and phasing of those emerging proposals.

This policy also includes a new requirement to ensure that development proposals which would be inconsistent with emerging plans for large scale development can be resisted, to better safeguard these development opportunities.

(Consultation document, p.51 §79)

- A new form of prematurity?
- Comparison to existing policy – note policy conflict irrespective of stage emerging has policy reached/whether prejudice is caused...



Governmental Structures



Margherita Cornaglia
Landmark Chambers



SETTING THE SCENE in Greater Cambridge:

Local, Regional, and National government structures

What I will cover:

- Who does what, what is changing, and how they fit together for plan-making, infrastructure and
- Refresher of three-layered decision-making (local, regional, national)
- With further detail coming from speakers that



Planning Governance: Local, Regional, National

LAYER	KEY ACTORS	PRIMARY ROLES
Local	Greater Cambridge Shared Planning	Shared planning service for City & District Councils Statutory plan-making, development management
Regional	Cambridgeshire & Peterborough Combined Authority	Mayoral Combined Authority Local Transport Authority Devolution Deal and non-statutory spatial framework
National	MHCLG, Homes England, Cambridge Growth Company, NPPF	Call-in powers (regularly used in Cambridge in recent years), funding, land assembly, infrastructure delivery, development corporation

Key Highlights of the Draft Local Plan

ASPECT	DETAILS
Consultation Period	Dec 1, 2025 – Jan 30, 2026
Jobs Forecast (2024–2045)	73,300 additional jobs
Housing Target	48,195 homes (≈2,295/year)
Pipeline Homes	37,865 already planned
New Sites Identified	~13,460 homes + buffer
Development Sequence	Urban Cambridge → Edge of Cambridge → Cambourne & new settlements → Rural Centres (Rural Centres & Minor Rural Centres)

Next Steps

Submission by end of 2026



Existing homes in Greater Cambridge:
131,612



New homes already in the pipeline for 2024-2045: 37,865

These will be built on sites allocated in current Local Plans, sites which already have planning permission, and on 'windfall' sites which are not specifically identified in plan but which are policy compliant.



Additional homes from new allocations for 2024-2045 to meet identified need: 10,330

Our total identified need for 2024-2045 is 48,195 homes.



Extra homes we are planning for, that gives us approximately 6.5% headroom for flexibility: 3,133



Timeline so far and next steps

Where are we in the plan-making process?



- **2020:** First Conversation consultation: gathered views on the issues facing the area and approaches that could be taken to address them
- **Nov 2021:** First Proposals consultation: proposed 'preferred options' for the level of development needs, allocations to meet them, and policies which would guide the consideration of planning applications.
- **2023-25:** reports and updates to the development strategy and Local Plan timetable published and considered by Members
- **1 Dec 2025-30 Jan 2026:** draft Local Plan and supporting documents consultation



Overview of Local Plan’s Development Strategy

POLICY CODE	FOCUS	KEY OBJECTIVE
S/JH	Jobs and Homes	Sets growth targets for 2024–2045
S/DS	Development Strategy	Directs where homes & jobs identified in S/JH should be placed
S/SH	Settlement Hierarchy	Prioritises urban and strategic sites to ensure development is located in the most sustainable places.
S/DE	Development Extents	Defines the boundaries of settlements for planning purposes
S/GB	Green Belt	Protects Green Belt with limited exceptions
S/MO	Monitoring	Sets out the Councils’ approach to monitoring policies



[Show document contents](#)

What this policy does

This policy sets out the proposed strategy for the pattern, scale and design quality of places created in *Greater Cambridge*, for the plan period to 2045 and beyond. It sets out where the homes and jobs identified in S/JH: New Jobs and Homes should be provided to meet the vision and strategic priorities of the *Local Plan*.

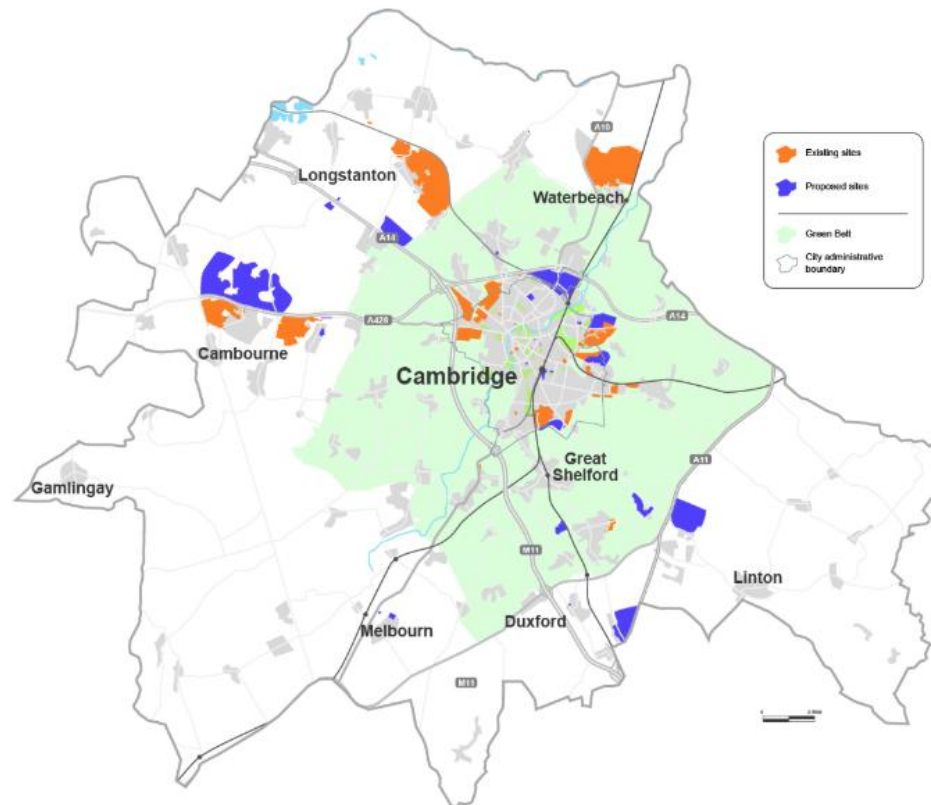


Figure 8: Map showing proposed *Development strategy*



S/SH

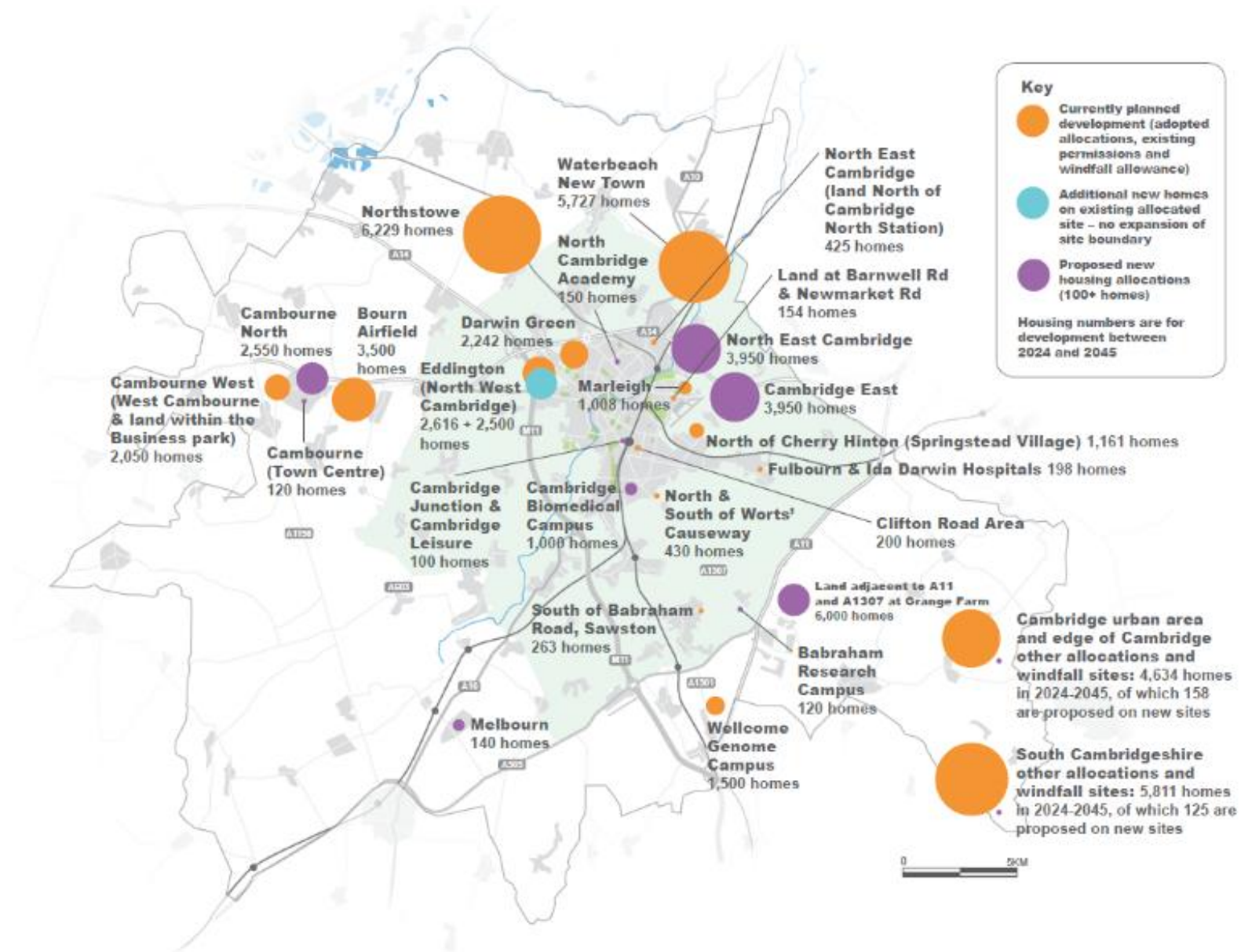


Figure 9: Illustrative map showing locations of proposed new housing development, 2024-2045



**REPORT TITLE: Draft Greater Cambridge Local Plan for consultation
(Regulation 18), and Update of Local Development Scheme**

Conclusion on the Local & interdependencies

4.6

Key issues impacting the Local Plan process

In recent years, the development of the Joint Local Plan has faced a number of issues relating to external factors, decisions and the programmes of others, including the government and infrastructure providers. Earlier stages of the Local Plan highlighted how the spatial strategy, and specific proposals under development, depended upon decisions on key infrastructure projects such as East West Rail (EWR) and the Cambridge Waste Water Treatment Works relocation, upon the clarification of the Governments ambitions for Cambridge, and clarification on proposed planning reforms, but also on the availability of a water supply that did not compromise the environmental quality of the areas precious chalk streams.

In the intervening period between the previous draft plan and the proposals now before the Council, considerable progress has been made in a number of these areas. A commitment from Government on supporting resolution of water supply challenges (and an approved WRMP) have enabled the Councils to put forward a growth trajectory that phases the additional new sites identified to improvements in available supply. Alongside a programme of planning reform, the Government has also continued and deepened its commitment to EWR and established the Cambridge Growth Company to underpin delivery of sustainable housing and economic growth in the area. Progress by the Greater Cambridge Partnership on infrastructure projects to provide enhanced public transport connections has also been made. The Combined Authority has also recently re-affirmed it committed to deliver a transport strategy for Greater Cambridge that meets the Local Plan's needs.

Further Info on the Local Plan

Draft Local Plan



Planning Authority YouTube



News Hubs



Regional: the CPCA



Get Cambridgeshire and
Peterborough moving

PAUL BRISTOW ELECTED MAYOR OF CAMBRIDGESHIRE AND PETERBOROUGH



CPCA Local Growth Plan



Purpose and Strategic Objectives

Strategic Framework Purpose

The plan provides a ten-year roadmap aligning local ambitions with national priorities for sustainable economic growth.

Collaboration and Devolution

It emphasizes collaboration among local authorities, businesses, and government to enable deeper regional devolution.

Sustainable and Inclusive Growth

The objectives focus on competitiveness, inclusive growth, and infrastructure that supports equitable and ecological sustainability.

Economic Scenarios

Baseline Growth Scenario

The baseline scenario assumes incremental growth based on historical trends with a conservative planning outlook.

Core Growth Scenario

The core scenario aims to double the economy to £61 billion, requiring targeted investments and policy support.

Aspirational Growth Scenario

The aspirational scenario projects tripling the economy to £97 billion with aggressive innovation and large capital inflows.



Priority Sectors, Opportunity Zones

Six Priority Sectors

The plan targets life sciences, advanced manufacturing, defense, digital tech, agri-food tech, and clean energy as growth drivers.

Opportunity Zones Strategy

Four geographic clusters focus resources and talent to maximize innovation impact and economic growth.

Global City Cambridge Zone

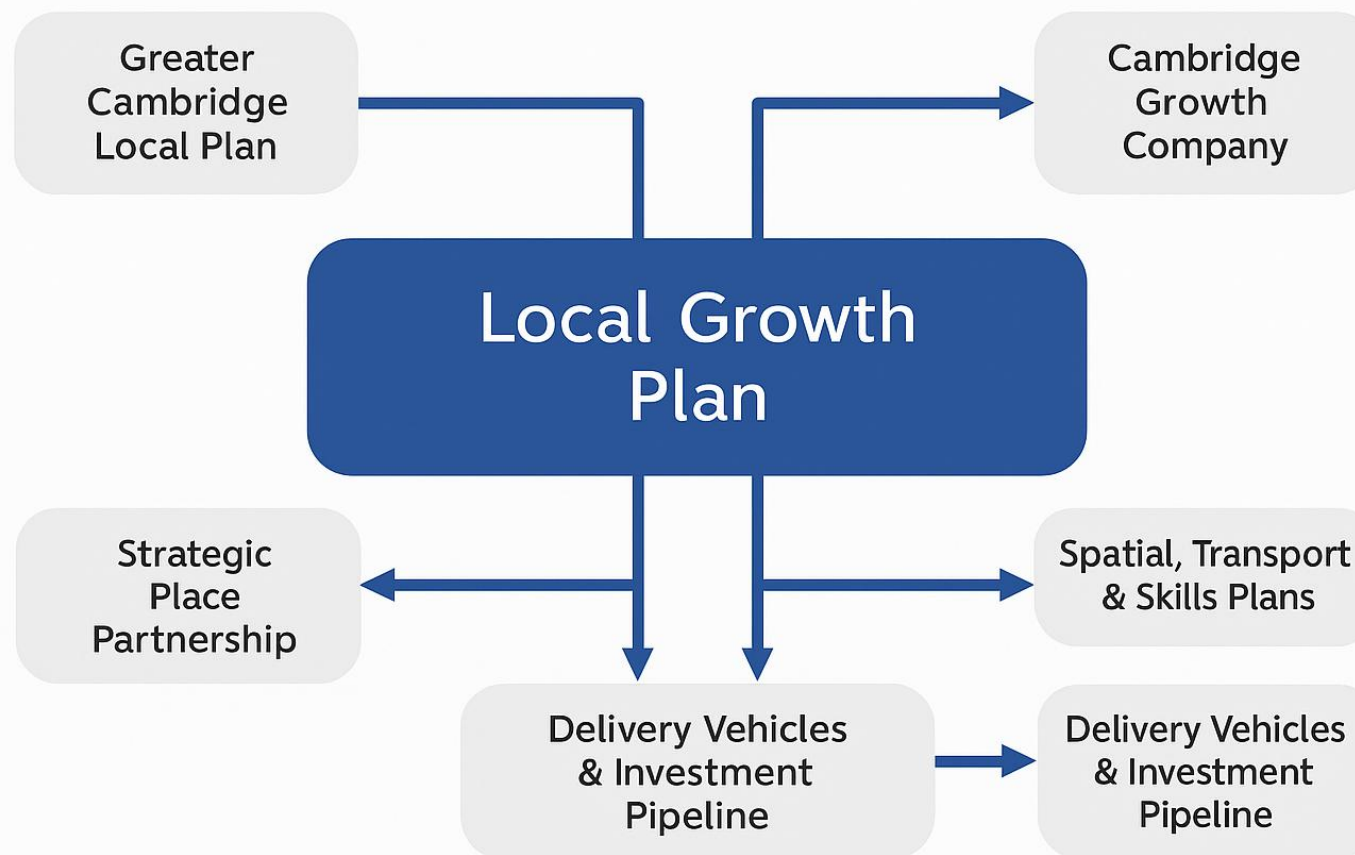
Flagship zone leveraging research institutions and entrepreneurship to drive breakthroughs in life sciences and digital technologies.

Infrastructure Led

Identifies enabling priorities across water, energy, rail and transport, and housing, to remove the supply-side barriers that would otherwise choke growth.



Interplay of the Mayor's Growth Plan



When it comes to options for delivering major sites, rather than giving powers to an unaccountable body, the best answer is the existing legal framework for Mayoral Development Corporations and involving local communities.



What to expect?



In conversation
with Paul
Bristow:
Mills & Reeve
Podcast

Mayoral
Development
Corporation for
Peterborough

Using MDC powers
to overcome land
and viability
barriers.

Collaborative
Delivery
Across Governance
Levels

Aligning national,
regional & local
action for faster
delivery.

SDS & Growth
Plan Alignment

Ensuring SDS
reflects Growth
Plan priorities
and direction.



The National: from Cambridge Growth Company to a Development Corporation

Key delivery issues

Water Scarcity



Cambridge Waste Water Treatment Plant DCO



Transport Strategy



East West Rail



Cambridge Growth Company



Cambridge Growth Company Mandate

The company accelerates development by assembling land and leading infrastructure projects in Greater Cambridge.

Advisory Council Guidance

Local leaders on the Advisory Council ensure that development aligns with regional priorities and community needs.

Governance and Statutory Planning

Until new legislation, local councils remain the statutory planners, guiding decisions under the draft Local Plan framework.

Future Structural Changes

Potential national corporation could reshape planning roles, highlighting the need for governance clarity during transitions.



Delivering for Greater Cambridge

The Government announced today (Thursday 23 October) their intention to consult on setting up a centrally-led Development Corporation to help plan, manage, and deliver large-scale development projects in Greater Cambridge.

Council leaders have said for many years that national intervention on matters such as water supply, wastewater, power, transport and healthcare has been urgently needed and have lobbied successive governments. Lack of water supply and infrastructure to deal with wastewater is already insufficient to ensure all the current locally planned high quality new communities and homes can be delivered.

The leaders of the councils have said that, like any announcement of this kind, further discussion and details are now needed to understand the Government's intentions and to ensure it also supports local priorities.

Both councils will work with Government to ensure decisions on the precise form and purpose that any development corporation takes are shaped and informed by good evidence and input from the democratically elected and accountable leaders for the area. Once more information is known the Government will consult local residents on setting up a development corporation, allowing local voices to be heard.

The Government's announcement today included:

- Up to £400 million of initial government funding to kickstart development
- A pledge to increase the supply of affordable homes
- Investment in infrastructure
- Business expansion – with £15 million for the University of Cambridge for a proposed Innovation Hub to create lab space for science start-ups to grow and compete on the global stage

What could a centrally led development corporation bring to Greater Cambridge? From the start, a development corporation would bring dedicated resources, an expert team and powers to fund and coordinate interventions that resolve the known bottlenecks causing delays to sustainable development.

A centrally led development corporation could:

- Put in place early-stage funding to accelerate delivery of sites already in local plans to remove known barriers such as water, enabling infrastructure, land ownership issues, and transport connectivity.
- Bring to bear the power, convening role and funding capacity of national government to improve residents' quality of life, alongside supporting Cambridge to contribute to national economic growth.
- Be innovative in leveraging and integrating large-scale public and private investment to achieve long-term transformation, creating lasting social, economic and environmental benefits.
- Use its powers to make targeted interventions that drive forward areas with the greatest potential for sustainable growth, with the right investment in transport to join workplaces up with homes and social and green infrastructure.
- Provide assurance to communities, by working closely with local partners to ensure long-term stewardship of developments to support the wellbeing of current and future residents in inclusive, thriving places.
- Provide stability and continuity by working well beyond the limitations of single economic, political or planning cycles.
- Plan for long-term sustainable growth, underpinned by a robust evidence base.



What powers could a Development Corporation have? Set up & Governance



ASPECT	EBBSFLEET	POTENTIAL CAMBRIDGE APPLICATION
Legislative Basis	Created by orders under the 1980 Act; area designated; corporation established; planning functions conferred by separate order.	Most likely the same 1980 Act route; similar statutory orders required post-consultation; Secretary of State designates area, creates corporation, and may confer planning functions.
Governance	Board appointed by Secretary of State; public planning committee; operates under arm's-length body rules	Likely similar governance and accountability structure
Relationship to local plans & plan-making	Decides applications in line with adopted district plans; can issue non-statutory frameworks	Would decide applications in line with the Greater Cambridge Local Plan? districts keep statutory plan-making powers?
Relationship with CPCA and Growth Company?	No mayoral combined authority or Growth company here but worked with / liaised with county and districts.	Relationship with CPCA and proposed Mayoral Corporation. Will the two coexist (?) Likely to sit alongside the Cambridge Growth Company, with a defined division of roles (?)
Process & Timing	Consultation in 2014; orders made in 2015; planning powers commenced 1 July 2015.	Announcement made October 2025. Consultation expected. Possibly in place by 2026?



What powers could a Development Corporation have? Funding and Powers



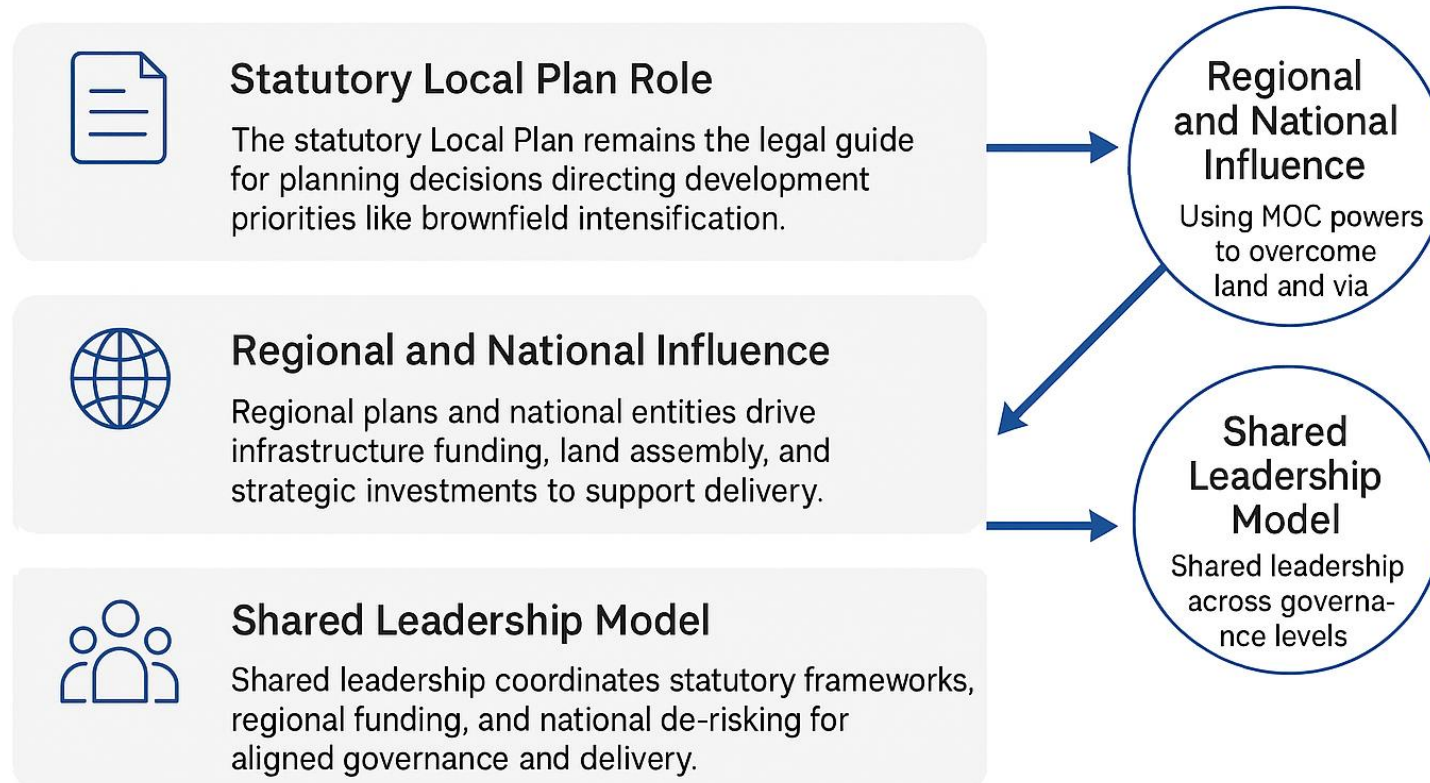
ASPECT	EBBSFLEET	POTENTIAL CAMBRIDGE APPLICATION
Funding and Finance	Central capital to kick-start infrastructure; developer contributions; access to national programmes.	Initial central funding signalled (400mn). In future, blend with Homes England finance and developer contributions? Potential fiscal tools if enabled?
Planning status	Acts as the local planning authority for development management and heritage; plan-making stayed with districts	Likely to act as development management authority (and heritage) inside its boundary; would plan-making stay with councils/district (likely)?
Land Assembly and CPO	Can acquire, hold and dispose of land; can promote compulsory purchase with confirmation by Secretary of State.	Expect the same land and compulsory purchase powers within the designated area
Infrastructure Delivery	Delivers / funds enabling infrastructure.	Something similar likely: Likely to lead on enabling works (water, transport, energy) with partners.
Transitional provisions	Undetermined cases and enforcement transferred at commencement; appeal rights preserved	Expect mirror transfer provisions and preserved rights in the establishment and planning orders



Conclusion

Layered Governance Structure

Governance in Greater Cambridge involves statutory, regional, and national bodies collaborating for growth delivery and planning.



Infrastructure Challenges: Water and Beyond



Richard Turney KC
Landmark Chambers



Outline

- Planning for new infrastructure: overview
- Water
- Transport
- Electricity
- Further reforms: PIA and EDPs



Planning for new infrastructure: overview

- Interaction between development plan and infrastructure planning
- Role of spatial development strategies: s 12D(4) PCPA 2004
- Infrastructure as a constraint on the grant of permission





Water

- Water supply as a constraint
- Waste water constraints
- Statutory duties to plan and make connections
- Water Resources Management Plan



Water & the Grampian Condition

- Grampian Regional Council v Secretary of State for Scotland 1984 SC (HL) 58: reference to “reasonable prospects”
- But British Railways Board v Secretary of State for the Environment [1994] J.P.L. 32: *“If he considers that it is in his interests to secure planning permission notwithstanding the existence of such difficulties, it is not for the planning authority to refuse it simply on their view of how serious the difficulties are”*
- Reaffirmed in R (Hillingdon London Borough Council) v Secretary of State for Transport [2021] PTSR 113
- Policy test: (a) planning purpose (b) fairly and reasonably related (c) not unreasonable
- No prospects at all of satisfying = unreasonable



Grampians in practice

- Horsham examples:
 - Rydon AC-2024-LON-000984
 - Ward [2025] Env LR 13
 - Crest Nicholson [2025] EWHC 2194 (Admin)
- Cambridge:
 - Cambridge North
 - Darwin Green



Water: where now?

- WMS 23 October 2025
- Anglian Water proposals (wastewater & potable)
- **Waste water treatment: what next?**
- **Fens SRO**
- Potential impediments to delivery

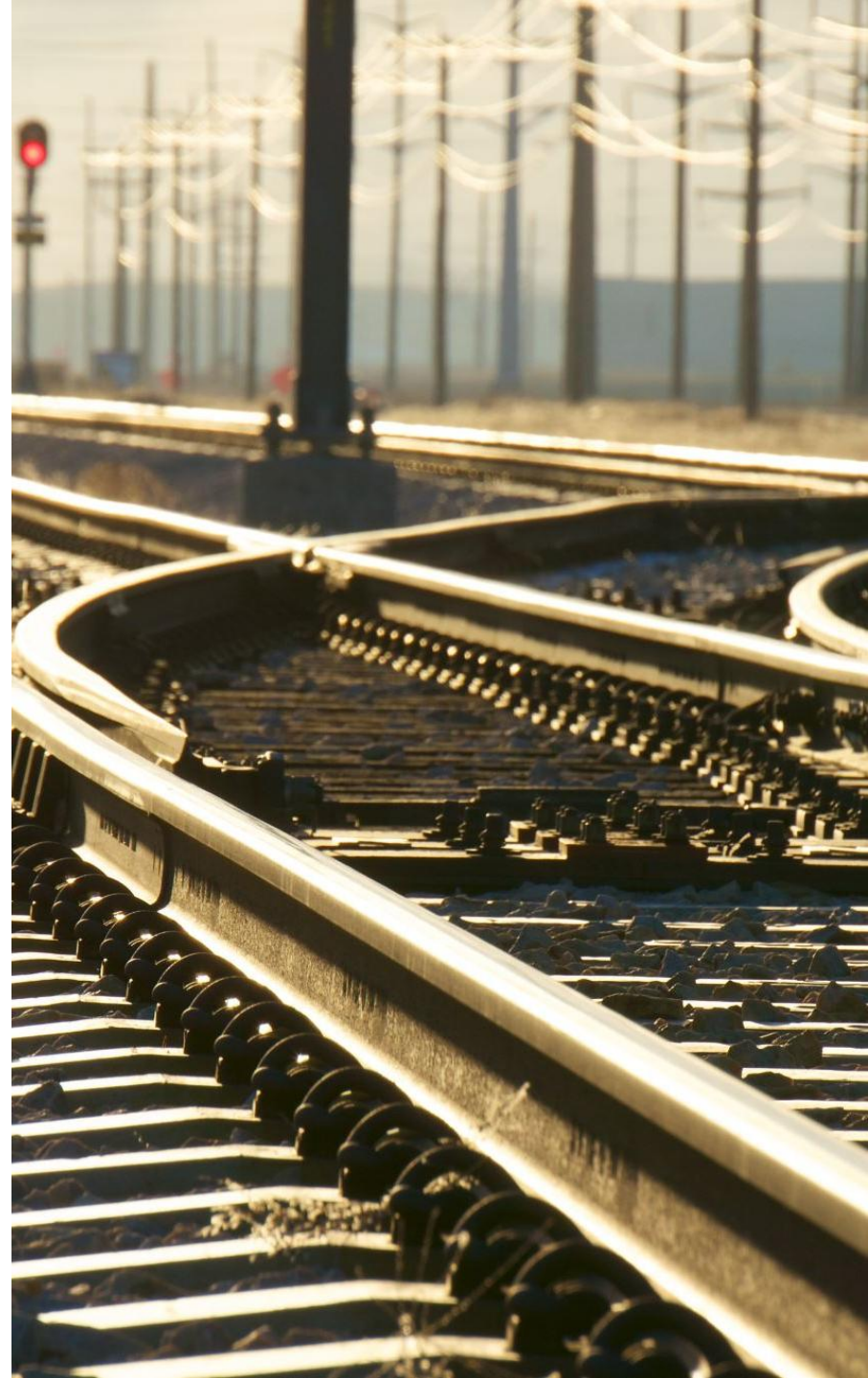


Anglian Water via [bbc.co.uk](https://www.bbc.co.uk)



Transport

- Cambourne to Cambridge
- TWAO process
- East West Rail
- DCO process



Electricity connections and transmission

- The rise of strategic planning
- **Strategic Spatial Energy Plan**
- **Regional Energy Strategic Planning**
- **Centralised Strategic Network Plan**
- Link to development plans
- Connections reform including PIA 2025 changes



PIA: EDPs

- Overview of EDP system (Part 3)
 - EDP process including amendment and challenges
 - General duties in respect of EDPs (s 94)
 - Payment of “nature restoration levy” (s 72-81)
 - Consequences for consents where relevant EDP in place (Schedule 3)
1. Disregarding environmental effects for purposes of Habitats Regs/SSSI duties
 2. Deemed grant of protected species licences



Panel Debate: Frameworks and Plans



Stephen Kelly MBE

Greater Cambridge Shared
Planning Service



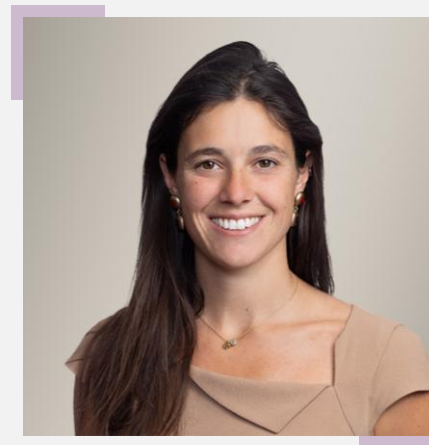
Melissa Murphy KC

Landmark Chambers



Richard Turney KC

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Margherita Cornaglia

Landmark Chambers



Guy Kaddish
Planning Partner



Planning Framework Updates

Decision-Making –

Lessons Learnt and Looking Ahead



Wait



Weight



Reflection



Reflection



Beehive Centre



Grafton Centre



Cambridge Discovery Campus



Darwin Green



Cambridge North



Botanic Place

Weight to date – Secretary of State Decisions

Benefits

- Substantial
 - Reuse of brownfield land
- Significant
 - economic growth and productivity in the Greater Cambridge area
 - employment benefits and derived social value
- Considerable
 - Market and affordable housing
- Moderate
 - community benefits
 - design and placemaking
 - sustainable transport
 - Well-being and social inclusion

Harms

- Great/Limited
 - Heritage impacts
- Significant
 - Residential amenity
- Limited
 - Townscape impacts

Reflection - Decision taking approach to Date

Beehive

- The scheme would break the skyline when seen from Castle Hill Mound, but not dramatically so... The overall impact on that viewpoint would be small... The scheme would be seen at some considerable distance from Redmeadow Hill and Lime Kiln Road but from there the perceived impact on the townscape would be negligible. The scheme would be **assimilated successfully into the wider townscape**. (IR 13.19)
- The scheme would be clearly distinct from the assets, and **legible as a piece of 21st Century Cambridge**. If there is harm, it is at the very lowest end of the spectrum, hardly interfering in any perceptible way with what is of value, or significance, in those assets. [IR 8.76]
- It would secure investment and global talent that would otherwise be attracted to international competitors such as Boston and the Bay Area, fully supporting the **government's ambition for growth in the Oxford–Cambridge innovation corridor**. (IR 8.42)
- Permission would enable work to commence on reserved matters, whereas deferment to the development plan process would **potentially delay the realisation of any benefits**. For all the reasons given in this report I believe that the balance falls towards the grant of permission. [IR 13.75]

Botanic Place

- This scheme would bring about **dramatic change but, architecturally, this would be positive** and add to the diverse character in the vicinity. [IR 35]



*Looking Ahead
- planning
weight*

Current NPPF

- **Two substantial weights**
 - **Green Belt Harm**
 - **Use of PDL (125c)**
- **Great weight**
 - **Housing on suitable sites in settlements**
 - **Education development**
 - **Conserving and enhancing national parks, the Broads, National Landscapes**
 - **Conserving designated heritage assets**
 - **Minerals extraction**
- **Significant weight**
 - **Economic development**
 - **Development reflecting design guidance**
 - **Outstanding and innovative design**
 - **Complying with the Golden rules**
 - **Public service infrastructure**
 - **Supporting energy efficiency**
 - **Renewable and low carbon energy**



Draft NPPF The approach



Para 7 - setting the tone for 'substantial' planning:

- Some of these policies indicate how much weight the government would expect a particular consideration to be given, including cases where it is appropriate to give substantial weight to certain benefits, and the limited circumstances in which it is expected that permission would be refused

Draft NPPF - the weights

- 14 substantial weights:

- **Providing accommodation** meeting the evidenced needs of the local community: HO7.
- **Economic benefits** of proposals for commercial development: E2.
- Supporting the overall **vitality and viability of town centres**: TC2.
- Making **effective use of land**: L2
- **Renewable and low-carbon energy development**: W3.
- **Water** supply, drainage and wastewater development: W4
- **Housing** development that **passes the “Golden Rules”**: GB8
- The **conservation of designated heritage assets**: HE6
- **Well-designed** places: DP3.
- New community facilities and public service infrastructure : HC4.
- Outstanding or innovative designs which promote high levels of sustainability: DP3
- Improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources: CC2
- Mineral extraction: M3
- Importance to maintain and enhance defence capability and public safety: P6

Draft NPPF - the direction



Ministry of Housing,
Communities &
Local Government

National Planning Policy Framework

December 2024

Seven other notable 'substantial' directions:

- **Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects:** S4
- Principle of **[defined] development outside settlements should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects:** S5
- For housing development, the **benefits of approving it are likely to be substantially outweighed** by the adverse effects where a proposal would conflict with a neighbourhood plan: S6
- The objective of the policies in this chapter is to support the delivery of a **substantial increase in the supply of homes:** Chapter 6
- Harm to the Green Belt: GB6
- Importance to conserve and enhance Protected Landscapes: N4
- Intentional unauthorised development: DM8

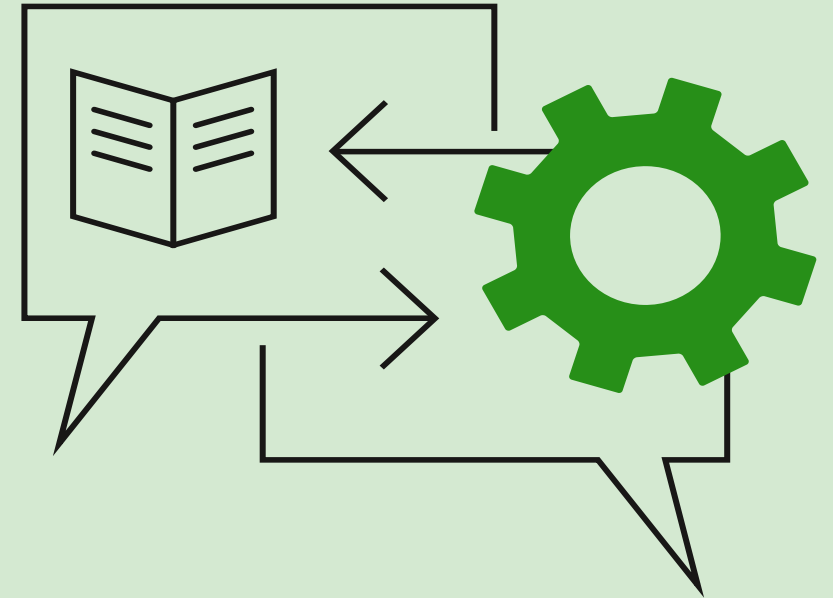
Refusal direction



- **Do not make efficient use of land** in accordance with density policy L3
- Town centre uses outside the town if a '**significant adverse impact**' on town centre **viability and vitality**: TC3
- **If not well designed**: DP3
- **Substantial harm to significance of heritage asset**, unless public benefits outweigh: HE6
- Development in an area known to be at **risk from flooding** (but with caveats): F7
- Extraction of peat: M5
- Hot food takeaways (in certain locations): HC5
- Incompatible risk from river or sea flooding: F6
- Significant harm to biodiversity IF not mitigated/compensated :N2
- Development in a bio site of international importance [but caveats]: N6
- Loss or deterioration of irreplaceable habitat, unless exceptional reason: N6

NPPF consultation - Annex A - Implementation

- Development plan policies which are in any way inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework.



What does this mean for Cambridge?

Height and density



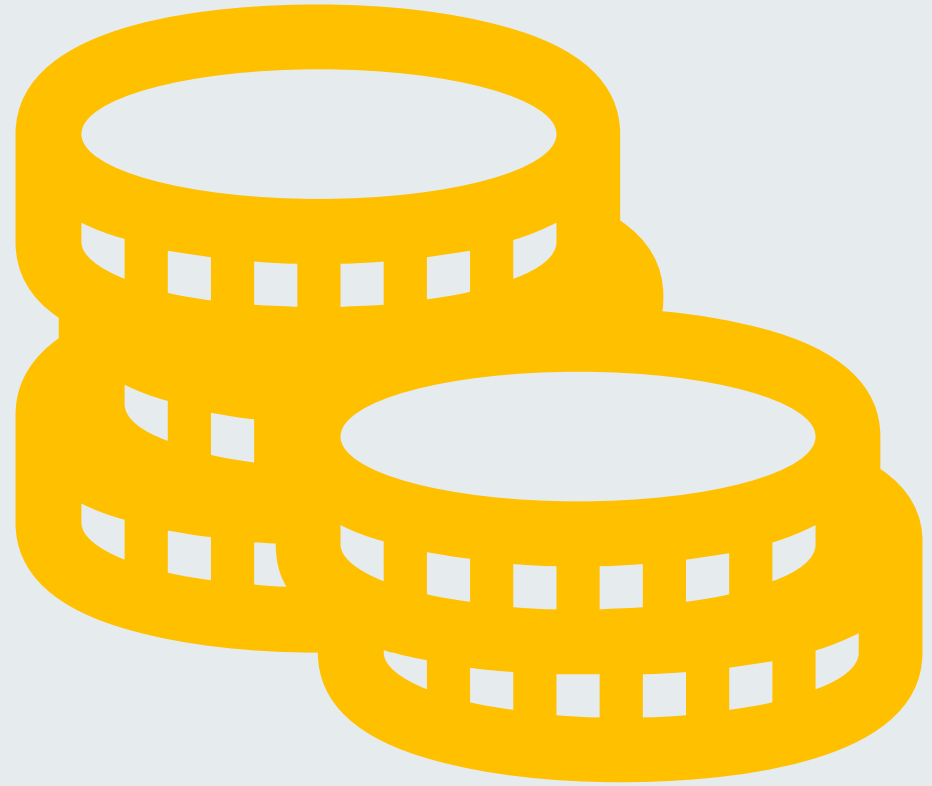
What does this mean for Cambridge?

Grey Belt and Golden Rules



What does this mean for Cambridge?

Substantial weight for economic benefits



Final Thoughts

Part of a Mission



PLAN FOR CHANGE

Milestones for mission-led government

5 December 2024

CP 1210

The Rise of Planning Balance



Forced to engage with
planning benefits

A path for good development to get consent





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Corporation

Viability and Deliverability

A focus on strategic sites through the lens of the draft NPPF consultation

Alex Round





Sample of 20 largest sites M&R has acted on

New homes consented: **56,210**

S106 affordable homes secured
(minimum subject to review): **11,732**

Average % of homes secured as s106
affordable housing: **21%**
(15% with CIL, 23% without CIL)

7 / 20 sites reached policy target %

0 / 20 sites reached policy target AND
were subject to CIL

Site	Year granted	Dwellings	Minimum AH secured in s106	Policy target?	CIL?
1	2019	6500	30%	No	No
2	2014	6200	0%	No	No
3	2018	5350	16%	No	Yes
4	2014	5000	12%	No	Yes
5	2014	4250	20.5%	No	No
6	2022	4000	40%	Yes	No
7	2021	3500	5%	No	No
8	2021	3000	30%	Yes	No
9	2017	2800	17.5%	No	Yes
10	2015	2400	15%	No	No
11	2017	1800	30%	Yes	No
12	2025	1600	15.5%	No	No
13	2024	1500	20%	No	Yes
14	2025	1450	50%	Yes	No
15	2016	1300	30%	No	No
16	2020	1200	40%	Yes	No
17	2014	1200	35%	No	No
18	2025	1110	10%	No	Yes
19	2016	1050	30%	Yes	No
20	2022	1000	40%	Yes	No

TOP 10 Sites 2000+ new homes “Super Strategic”

New homes consented: **43,000**

S106 affordable homes secured
(minimum subject to review): **7,803**

Average % of homes secured as
affordable housing: **18%**
(15% with CIL, 20% without CIL)

2 / 10 sites reached policy target

Site	Year granted	Dwellings	Minimum AH secured in s106	Policy target?	CIL?
1	2019	6500	30%	No	No
2	2014	6200	0%	No	No
3	2018	5350	16%	No	Yes
4	2014	5000	12%	No	Yes
5	2014	4250	20.5%	No	No
6	2022	4000	40%	Yes	No
7	2021	3500	5%	No	No
8	2021	3000	30%	Yes	No
9	2017	2800	17.5%	No	Yes
10	2015	2400	15%	No	No
11	2017	1800	30%	Yes	No
12	2025	1600	15.5%	No	No
13	2024	1500	20%	No	Yes
14	2025	1450	50%	Yes	No
15	2016	1300	30%	No	No
16	2020	1200	40%	Yes	No
17	2014	1200	35%	No	No
18	2025	1110	10%	No	Yes
19	2016	1050	30%	Yes	No
20	2022	1000	40%	Yes	No

NEXT 10 largest sites 1000 - 2000 new homes

New homes consented: **13,210**

S106 affordable homes secured
(minimum subject to review): **3,929**

Average % of homes secured as
affordable housing: **30%**
(16% with CIL, 33% without CIL)

5 / 10 sites reached policy target

Site	Year granted	Dwellings	Minimum AH secured in s106	Policy target?	CIL?
1	2019	6500	30%	No	No
2	2014	6200	0%	No	No
3	2018	5350	16%	No	Yes
4	2014	5000	12%	No	Yes
5	2014	4250	20.5%	No	No
6	2022	4000	40%	Yes	No
7	2021	3500	5%	No	No
8	2021	3000	30%	Yes	No
9	2017	2800	17.5%	No	Yes
10	2015	2400	15%	No	No
11	2017	1800	30%	Yes	No
12	2025	1600	15.5%	No	No
13	2024	1500	20%	No	Yes
14	2025	1450	50%	Yes	No
15	2016	1300	30%	No	No
16	2020	1200	40%	Yes	No
17	2014	1200	35%	No	No
18	2025	1110	10%	No	Yes
19	2016	1050	30%	Yes	No
20	2022	1000	40%	Yes	No

Draft NPPF Consultation – 3 key NDMPs

HO13

**Build out of
residential and
mixed-use
development**



GB8

Golden Rules



DM5

**Development
Viability**



HO13: Build out of residential and mixed-use development

We are interested in views on whether this policy, in conjunction with the others which we are proposing, provides a sufficient framework to support very large sites. The government wants to see more very large sites – what might be considered ‘super strategic sites’ – taken forward, including the implementation of the government’s new towns programme. We therefore want to understand whether any more specific definitions or approaches are needed or could be beneficial for this purpose.

HO13: Build out of residential and mixed-use development

2. Consideration should be given to whether to impose a planning condition requiring that development begins within a timescale shorter than the relevant statutory default period, where this would expedite the development without threatening its implementation or viability.

3. Where there are development proposals for large scale residential and mixed-use development which will be implemented through multiple phases across development plan periods, the consenting framework for the proposal should:

a. Secure the approach to design, infrastructure and other site-specific requirements for the development, including the scale of affordable housing; and

b. Be flexible enough to respond positively to changing circumstances as phases are brought forward, including changes to housing need, viability and design.

GB8: The Golden Rules

3. There are only three circumstances in which a site-specific viability assessment may be justified to allow the contributions expected by this policy to be adjusted, which are where a development proposal is:

a. On previously developed land;

B. FOR A MULTI-PHASE, STRATEGIC SITE; or

c. For a development model which is of a wholly different type to that assumed in the viability assessment that informed the development plan.

DM5: Development viability

2. There may be **limited circumstances** in which it would not be possible for development to proceed on a policy compliant basis, and a viability assessment to inform decision-making is justified to ensure that a proposed development makes the maximum possible contribution to affordable housing and other infrastructure. Such circumstances **may include** situations where:

- a. The development is significantly different from any typology assumed in the development plan viability assessment;
- b. Site characteristics differ substantially from the assumptions used to assess viability when the relevant development plan policies were prepared;
- c. The development is demonstrably burdened by costs which were unforeseeable when the development plan was prepared; and/or
- d. Site or economic circumstances have changed significantly since the development plan was prepared.

DM5: Development viability

4. Where a viability assessment is submitted with a development proposal, this should be based upon and refer back to the viability assessment(s) that informed the relevant development plan policies. It should fully evidence all inputs and assumptions used in the assessment, and explain any differences from those used for viability assessment that informed the relevant plan policies.

All viability assessments should reflect the recommended approach in planning practice guidance, utilising the standardised inputs set out in [Annex X – to be added subject to the outcome of this consultation], and should be made publicly available.

NPPF Annex B – Standardised inputs in viability assessment

Developer returns: Alternative metrics

The government is aware some developers and surveyors sometime use metrics other than profit on gross development value (for example the Internal Rate or Return or Return on Capital Employed) to assess investments. Alternative metrics may provide a more effective measure of cash flow in certain contexts, given their ability to manage return over longer periods of time. Conversely, however, they may also be more volatile than percentage of Gross Development Value.

The government is interested in views on whether supplying guidance on additional metrics would support timely housing delivery, and the goal of securing plan policy compliance where this is possible.

207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

What about existing consents?

- S73 & S96A applications
- S73B (“material variations”, not “substantially different”)
- S106A deed of variation
- S106A application route, currently limited by:
 - Time (5 years); and
 - Clarity re meaning of “useful purpose”
- Further guidance awaited



Get in touch



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Neil Cameron KC
Landmark Chambers



Introduction

1. Context
2. Changes and uncertainty
3. Navigating the uncertainty



Context

- Planning – South Cambridgeshire DC and Cambridge CC
- Plan making and decision taking powers
- Adopted local plans



Changes and uncertainty (1) Plan Making

- Emerging Local Plan: Current aim is to submit for examination before the end of December 2026 (updated LDS November 2025)- under the current system
- New plan making system (amendments to PCPA 2004)
- **Section 12A –spatial development strategy** (added by Planning and Infrastructure Act 2025– not yet in force)
- **Section 12A(3)** (as proposed to be inserted by the English Devolution and Community Empowerment Bill Schedule 2 para.2)- SDS power to be exercised by the Mayor
- **Section 15C – Local Plans** (added by LURA 2023, not yet in force)
- **Section 15CC Supplementary Plans** (added by LURA 2023 not yet in force)
- The December 2025 Draft NPPF

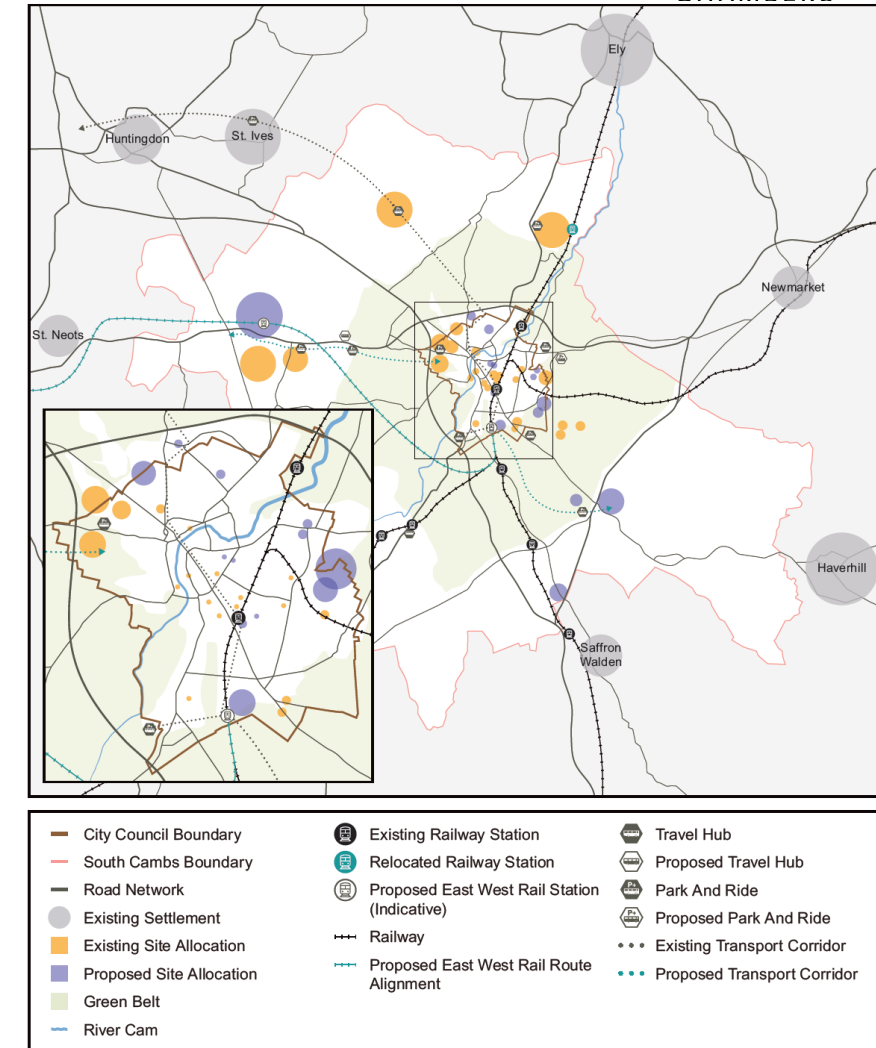


Figure 1: Strategic vision key diagram for Greater Cambridge



Changes and Uncertainty (2)

Decision Taking

Schedule 12 of the English Devolution and Community Empowerment Bill

Mayors will have powers equivalent to the Mayor of London (under section 2A of the TCPA 1990) to determine applications of potential strategic importance



Changes and Uncertainty (3) Local Government Re-organization

OPTION A

Unitary 1
Fenland
Huntingdonshire
Peterborough

OPTION B

Unitary 1
Fenland
Huntingdonshire
Peterborough
East Cambridgeshire

OPTION D

Unitary 1
Peterborough
Part of Huntingdonshire

OPTION E

Unitary 1
Huntingdonshire

Unitary 2
East Cambridgeshire
Cambridge City
South Cambridgeshire

Unitary 2
Cambridge City
South Cambridgeshire

Unitary 2
Cambridge City
South Cambridgeshire

Unitary 2
East Cambridgeshire
Fenland
Peterborough

Unitary 3

Unitary 3

Unitary 3
East Cambridgeshire
Fenland
Part of Huntingdonshire

Unitary 3
Cambridge City
South Cambridgeshire



Changes and Uncertainty (4) Development Corporation

- Section 3 New Towns Act 1981- new towns
 - Section 135 Local Government, Planning and Land Act 1980 – urban development areas
 - Section 135A Local Government, Planning and Land Act 1980 –oversight bodies for locally-led urban development area.
 - English Devolution and Community Empowerment Bill
- Schedule 18 – Mayoral Development Corporations in areas of mayoral combined authorities



Changes and Uncertainty (5) Development Corporation

Matthew Pennycook MP ministerial statement 23rd Oct 2025

“I am therefore announcing today that the government intends to consult on establishing a centrally-led development corporation to deliver nationally significant growth in Greater Cambridge.”

Local Growth Plan

Mayoral development corporations are contemplated



Changes and Uncertainty (6)

Development Corporation

Section 7(1) TCPA 1990

7.— Urban development areas.

(1) Where an order is made under subsection (1) of section 149 of the Local Government, Planning and Land Act 1980 (urban development corporation as planning authority), the urban development corporation specified in the order shall be the local planning authority for such area as may be so specified in place of any authority who would otherwise be the local planning authority for that area for such purposes and in relation to such kinds of development as may be so specified.

Similar powers in relation to

- New Town development corporations (section 7ZA, not yet in force)
- It is not clear whether any development corporation will have plan making powers. However, if the DC is to facilitate development in addition to that contemplated in local plans, will it need plan making powers to give that development legitimacy?



Changes and Uncertainty (7) Development Corporation

Mayoral Development Areas – section 7A(2) TCPA 1990

(2) The Mayoral development corporation is the local planning authority for that area for those purposes in place of any authority who would otherwise be the local planning authority for that area for those purposes.



Navigating the Uncertainty (1)- Plan making

Emerging Greater Cambridge Local Plan-

Maintain allocation (if allocated)

Development Corporation

If not allocated in the LP, and if a 1980 Act DC has plan making powers- seek an allocation

Spatial Development Strategy

In the longer-term amount or distribution of housing may be promoted through a spatial development strategy (specific sites cannot be specified in an SDS – s.12D(12)(b) PCPA 2004 (not yet in force))

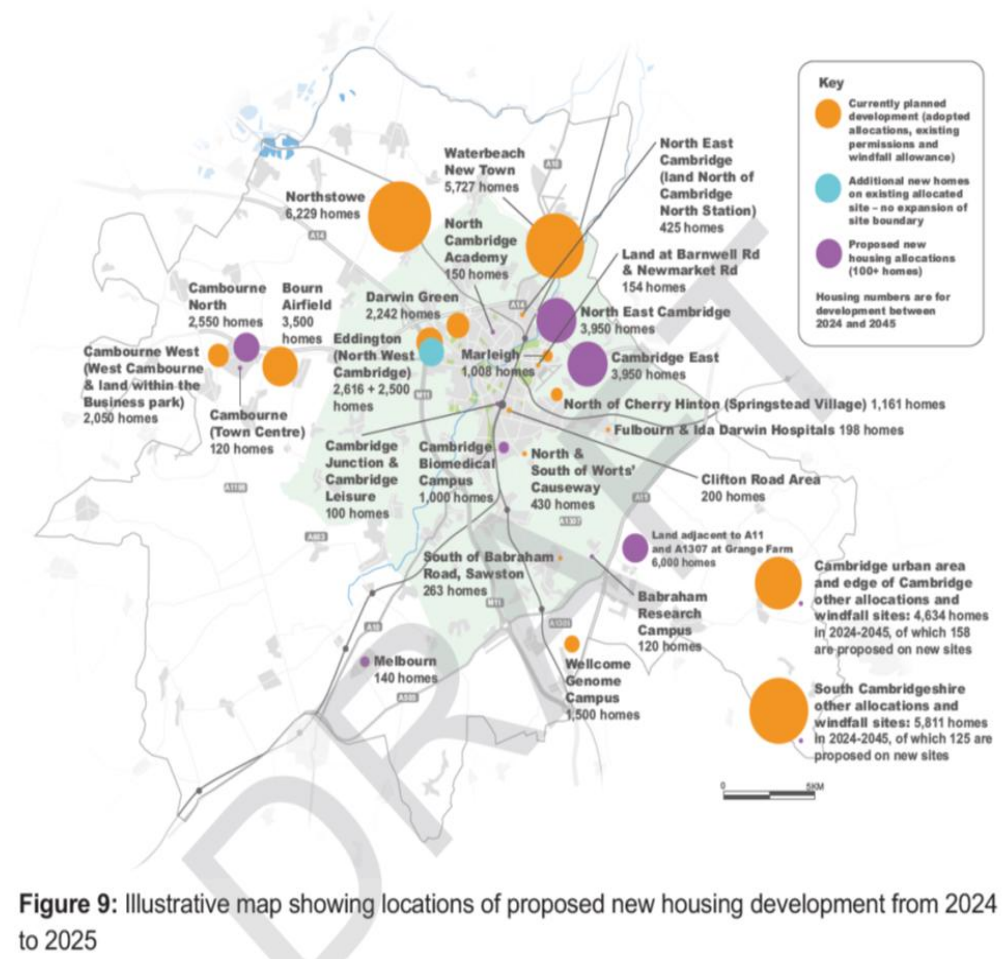


Figure 9: Illustrative map showing locations of proposed new housing development from 2024 to 2025

Navigating the Uncertainty (2)- Decision taking

Existing local authorities

Development Corporation

Applications of potential strategic importance – the Mayor



Navigating the uncertainty (3)

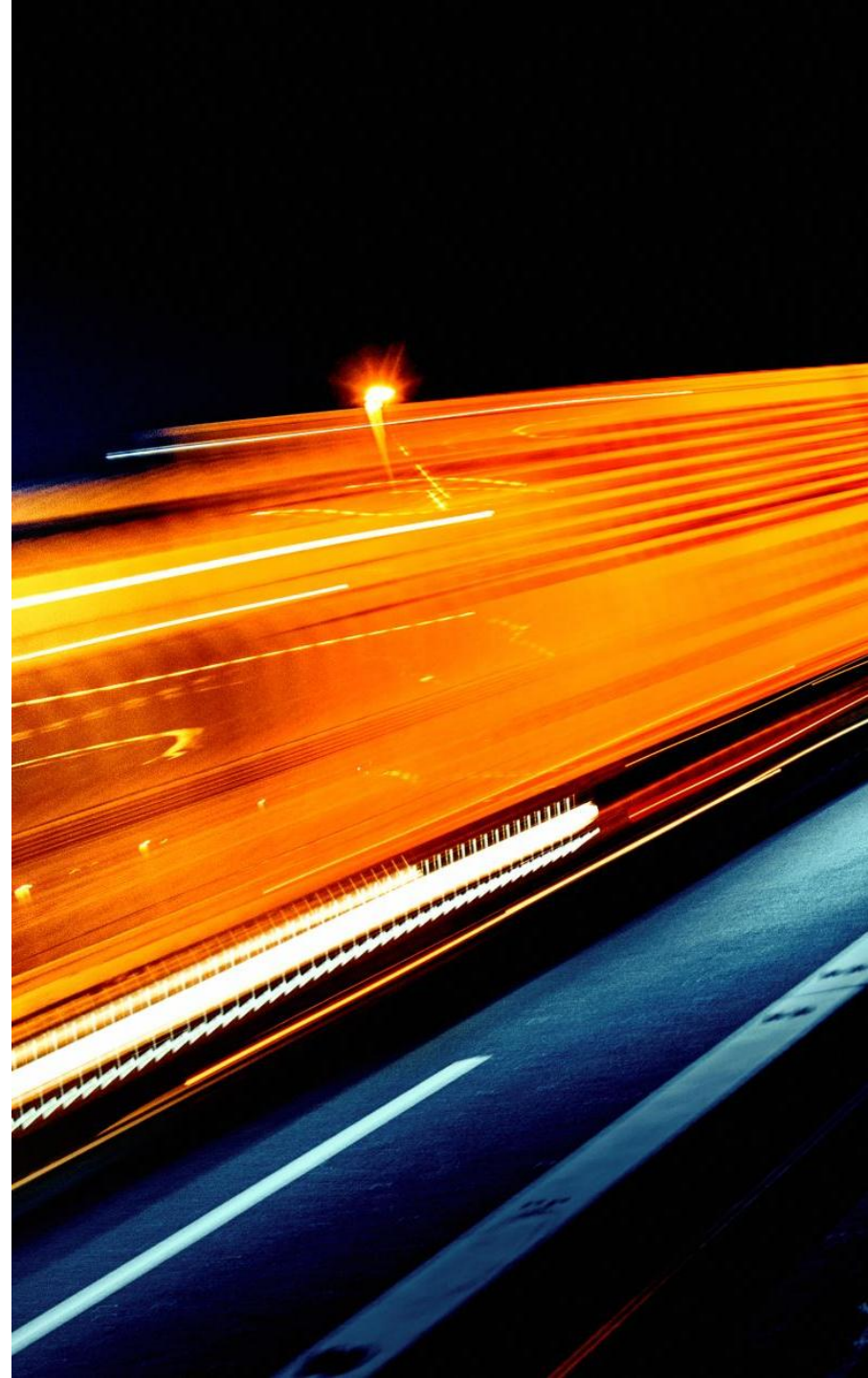
Promoting a mixed-use development

- Development plan support- if not in the emerging local plan, consider development corporation plan making powers.
- Decision taking-
 - Development Corporation decision making powers
 - The Mayor – applications of potential strategic importance
 - Appeal to the Secretary of State



How to speed up delivery- some thoughts

- A clear indication should be given that the local plan process will be allowed to run its course so developers and the public can have confidence that the allocations will come forward.
- Any development corporation should indicate that it will respect the existing local plan and seek to add to it.
- The Mayor should indicate that he will also respect the outcome of the local plan process and seek to add to it.



Panel Discussion



Paul Bristow

Mayor of Cambridgeshire and Peterborough



Peter Freeman CBE

Cambridge Growth Company



Guy Kaddish

Bidwells



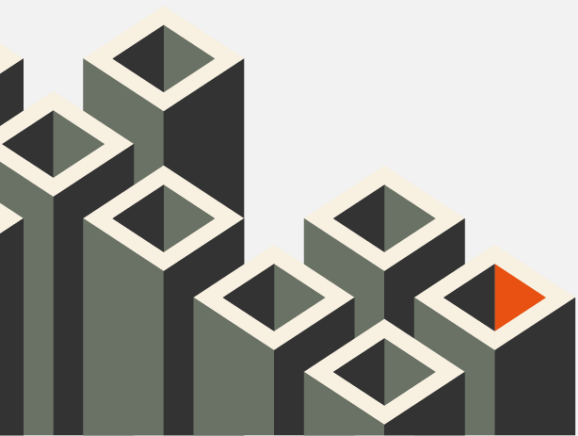
Alex Round

Mills & Reeve



Neil Cameron KC

Landmark Chambers



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Thank you for joining us!