

# Great Places

## Topic Paper



# Greater Cambridge Local Plan

Topic Paper published as part of the draft Local Plan -  
Regulation 18 consultation (December 2025 - January 2026)



## Topic Paper: Great Places

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# 1. Introduction and purpose

1.1 This is one of nine topic papers produced to inform the Draft Plan consultation on the Greater Cambridge Local Plan. The topic papers are:

- Strategy
- Sites
- Climate Change
- Green Infrastructure
- Wellbeing and Social
- Great Places
- Jobs
- Homes
- Infrastructure

1.2 All of the papers can be found on the Greater Cambridge Shared Planning website. The topic papers set out how each policy under the relevant Local Plan 'Theme' has been developed. As such, the topic papers support and complement the Draft Plan consultation document as they provide a detailed explanation of the basis for each draft policy.

1.3 The topic papers build on those published as part of the First Proposals Consultation. They provide background on the early development of the policies. These are still available to view in our document library.

1.4 The policies are presented in a consistent format in each paper with sufficient information to provide a comprehensive appreciation of the background to and development of the Policy.

1.5 The content and structure for each policy option is:

- The issue the plan is seeking to respond to
- How the issue was covered in the First Proposals consultation

- Policy Context update
- Summary of issues arising from First Proposals representations
- New or updated evidence
- Draft policy and reasons
- Response to main issues raised in representations
- Further work and next steps

1.6 The Local Plan is supported by a wide range of evidence which can be found in our document library. Key supporting documents to the plan include:

- Statement of Consultation
- Sustainability Appraisal
- Habitats Regulations Assessment
- Equalities Impact Assessment (EQIA)

## 2. Great places chapter

### Introduction

- 2.1 As part of the First Conversation consultation in 2019 we set out our approach to ensuring that the creation of great places and enhancement of existing places would be at the heart of the new local plan.
- 2.2 The First Proposals consultation in 2021 identified how great places had influenced the emerging strategy, and proposed a series of development management policies which would ensure development delivers great places and enhances existing places.
- 2.3 A number of comments were received on the general approach to the theme. Further detail, including where to view the full representations and who made each representation, is provided in the Consultation Statement.

### Summary of the main issues raised in general comments on the great places theme

- 2.4 Many individuals, public bodies, third sector organisations and developers expressed support for the aims of the Great Places policies.
- 2.5 A number of respondents emphasised the importance of including policies which will protect Cambridge's historic environment. Cambridge Past, Present and Future commented that the Local Plan needs to not only focus upon historic assets, but also recognise the historic significance of the whole of Cambridge and ensure that its historic setting is protected from cumulative impacts. Historic England (HE) provided a detailed representation, in which they expressed concerns about the density and height of some of the site proposals and the need for Heritage Impact Assessment to be carried out to inform the next stage. HE also noted the need to have policies covering

designated and non-designated historic assets, heritage at risk, historic shopfronts, and tall buildings. Comments also noted that Great Places are more than just about the design of buildings but creating communities with access to services, facilities, nature and open spaces.

2.6 Some comments considered that development proposed would impact negatively on the delivery of the goals set out in this chapter. A few developers commented that the sites that they were proposing would fulfil the aims of the policies. Several commentators emphasised the importance of delivering facilities and infrastructure to ensure that new development results in great places.

2.7 In terms of the additional survey questions which were attached to this round of consultation, in the responses to Q.13 (which relates to the aspirational vision for Greater Cambridge) there was a strong aspiration to preserve Greater Cambridge's historic buildings and wider heritage and a critical comment of GCSP's approach to urban design of new settlements.

## **Response to the main issues raised in representations**

2.8 Respondents raised a number of important matters through previous consultations on the emerging Local Plan. These matters have been considered during the preparation of the plan and its policies.

2.9 The Councils' response to these matters includes:

- Acknowledging support for policies which address great places themes.
- Policies have been developed to ensure the historic environment is considered in planning decisions. Heritage impact assessments have been prepared to inform proposed site allocations.
- Agree that delivering great places is more than just the design of buildings. The plan as a whole seeks to address the full range of issues that will be

needed to create successful communities.

2.10 More detailed commentary relating to the ways in which the policies in this theme have been amended in response to comments provided through previous consultations are set out in the sections below.

## **Great places policies**

2.11 The following proposed policies areas are addressed in this topic paper:

- GP/PP: People and place responsive design
- GP/QD: Achieving high quality development
- GP/HD: Housing density
- GP/ST: Skyline and tall buildings
- GP/QP: Establishing high quality landscape and public realm
- GP/LC: Protection and enhancement of landscape character
- GP/CC: Adapting heritage assets to climate change
- GP/HE Historic Environment
- GP/HA Designated Heritage Assets
- GP/ND Non-Designated Heritage Assets
- GP/AR Archaeology
- GP/CC: Adapting Heritage Assets to Climate Change
- GP/SF: Shopfronts

2.12 The Green Belt policy has been moved to the strategy theme:

- GP/GB: Protection and enhancement of the Cambridge Green Belt.

## 3. Policy GP/PP People and place responsive design

### Issue the Plan is seeking to respond to

- 3.1 This policy seeks to provide a strategic vision for achieving high quality design in for both urban and rural areas. It sets requirements around understanding the context of development proposals – both in terms of impact on the place around them and the needs of users.

### How the issue was covered in the First Proposals consultation

- 3.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: [Policy GP/PP: People and Place Responsive Design | Greater Cambridge Shared Planning](#).
- 3.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail: [Great Places Topic Paper 2021](#).

### Policy context update

#### National Planning Policy Framework (NPPF, December 2024)

- 3.4 The development from the 2021 to the 2024 NPPF suggests that there are certain key updates emphasising:
- Design Codes Status
  - Design Implementation
  - Applicant Responsibility
  - Enforcement Tools
  - Community and Place
- 3.5 Regarding the NPPF (2021) Section 12, both Paragraph 127 and 126, there is an emphasis in developing a communal, inclusive and high-quality design in both

rural and urban areas, through the acknowledgement of development proposals and considering the greater representation on the built environment and the needs of the people. This is referred and supported by the expansion of the sustainable development narrative in Paragraph 11a looking to include infrastructure, climate change and people in all aspects of land use areas.

- 3.6 This emphasis on design and its impacts on the economic, environmental and social aspects understood as the encouragement of sustainable development is further promoted in the NPPF (2024) Section 12, Paragraph 140.
- 3.7 Expanding on the obligation of local planning authorities in ensuring that plans and drawings provide visual clarity and are clear about the approved use where appropriate. This supports the better enforcement and delivery of high-quality and context-sensitive design and its continuity across the development cycle.
- 3.8 NPPF (2024) Paragraph 138, argues a stronger role of the National Model Design Code, as the primary basis for the construction and use of local design codes, increasing its influence on responsive design at local level. This supports a consistent design approach that conserves the local character and community aspect. The guidance states, that there is the expectation from the applicant in providing sufficient information, to demonstrate that they are achieving the desired outcomes in design expectations from both the local and national context. This is critical with the policy's focus in responding to place and address of user's needs.

### Planning Practice Guidance

- 3.9 The National Planning Practice Guidance (PPG) supports the implementation of the design policies in the NPPF by promoting a more transparent and accessible approach to design within the planning process. It emphasises the importance of both strategic and non-strategic policies in local plans to clearly set out design expectations. In particular, non-strategic policies are highlighted as essential tools for identifying the types of development appropriate in specific areas and for enabling more detailed, locally tailored design guides, codes, and masterplans. The PPG also encourages the use of robust community engagement and design

review processes to ensure that development proposals respond meaningfully to local character, context, and user needs. Additionally, it advises that local plans should outline how design tools, such as design reviews, are expected to be applied to support high-quality, people- and place-responsive design outcomes.

### National Design Guide, Planning practice guidance for beautiful, enduring and successful places, 2021

3.10 The National Design Guide is a planning practice guide from the Ministry for Housing Communities and Local Government (MHCLG). It builds on the NPPF that references it at Paragraph 133 (Section 12) and makes it clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The focus of the guide is on good design in the planning system and is aimed at local authority planning officers, to inform development proposals and their assessment by local planning authorities, it supports Paragraph 134 which supports the preparation and use of design codes to help shape good design. The refusal of permission for poor design is a planning outcome/decision rule applying to developments that do not comply with these or other design policies.

3.11 It sets out 10 characteristics of good design, listed below, and seen in figure 1 below:

1. Context - enhances the surroundings;
2. Identity – attractive and distinctive;
3. Built form – a coherent pattern of development;
4. Movement – accessible and easy to move around;
5. Nature – enhanced and optimised;
6. Public spaces – safe, social and inclusive;
7. Uses – mixed and integrated;
8. Homes and buildings – functional, healthy and sustainable;
9. Resources – efficient and resilient;
10. Lifespan – made to last.



**Figure 1: 10 characteristics of good design** (Source: Ministry for Housing Communities and Local Government: National Design Guide (2019)).

### Regional / local context

#### Cambridgeshire Quality Charter for Growth, Cambridgeshire County Council (2008)

3.12 The Cambridgeshire Quality Charter emerged from CABI research to better understand how the design of higher density schemes could accommodate a mix of people. The Quality Charter aims to enable diverse stakeholders to agree on the basic principles of good design ahead of plans being approved. It was based on research made up of a series of study tours and workshops to draw lessons from best practice in both the UK and in Europe. This document is currently

referred to applicants as it sets out the core principles for the level of design quality to be expected in new developments.

- 3.13 The Charter sets out core principles for achieving quality new homes and neighbourhoods in new developments in the five authorities that make up the County of Cambridgeshire. There are four themes – Community, Connectivity, Climate and Character – and each is supported by nine guidelines.
- 3.14 The Charter was adopted by the local authorities in 2007, and enables the authorities, developers and landowners to collaborate on meeting higher standards. It is used by the Cambridgeshire Quality Panel that reviews all major schemes and reports back to the developer and the local authority concerned. With experts on each of the themes the Panel is able to improve design before schemes are approved.

#### Cambridgeshire Quality Panel

- 3.15 The Cambridgeshire Quality Panel is administered by Cambridgeshire County Council and is governed by its own terms of reference. Within the Greater Cambridge area, it reviews strategic scale allocations within the adopted local plans infrastructure projects ; all new schools and extensions In Cambridge City, the Cambridgeshire Quality Panel reviews sites that are generally covered by the City Fringes Joint Development Control Committee. The Cambridgeshire Quality Panel may also review policies, guidance and documents that have a strategic and spatial implications at a sub-regional scale. It uses the Cambridgeshire Quality Charter for Growth's four Cs as criteria for its assessments:
1. Community – Building a sense of community by providing a greater choice of housing along with community facilities which assist active participation of people in their neighbourhoods (including encouraging developers to set up proper systems of governance for their developments early in the process);
  2. Connectivity – Locating new developments where they can benefit from high connectivity to jobs and services and provision of sustainable infrastructure to match the pace of the development;

3. Climate – Tackling climate change through good design, site layout and imaginative landscaping, including innovative approaches to energy, transport, waste and water (water treated as a friend not an enemy);
4. Character - Creating places of character with distinctive neighbourhoods and public realm that encouraged people to walk and cycle.

### **Summary of issues arising from First Proposals representations**

- 3.16 Many individuals, public bodies and developers expressed general support for policy GP/PP.
- 3.17 Some respondents argued that policies need to avoid creating repetitive buildings such by as requiring varied height and massing, and that a policy that is applicable to Greater Cambridge shouldn't dilute the details relating to the special character of Cambridge. A few landowners suggested that developments which demonstrated a high standard of design should be fast-tracked through the planning application process.
- 3.18 There were different perceptions about what the scope of the policy should be; a few of landowners argued that design codes should not be imposed on smaller developments where other mechanisms could achieve similar outcomes. Similarly, a few developers argued that the phrasing of the policy should be altered so that new development only needed to respond to local design contexts rather than the architecture of the Greater Cambridge area. On the other hand, the Cambridge Doughnut Economics Action Group argued that the policy was too narrowly focussed upon aesthetics, when actually a more holistic approach was required to promote things such as connected, participatory collective spaces.
- 3.19 Historic England questioned whether one policy relating to design would be sufficient, whereas a few respondents queried whether having two policies was necessary. Developers such as ABRDN argued that the policy needed to include sufficient flexibility for well-designed and high-quality buildings even if they are taller than the surrounding townscape. Contrastingly, Historic England and others

argued that great care needs to be taken to protect Cambridge's skyline, views, and approaches and that the Local Plan should be informed by a Tall Building and Skyline study.

3.20 Many commentators noted the need to engage with local communities to improve the design of developments and when creating design codes. The British Horse Society argued that greater attention needs to be paid to designing for non-motorised forms of transport and developments should maximise opportunities to link and enhance with existing Public Rights of Way. Some developers commented that their sites could fulfil the policy and one respondent argued that the relocation of the waste water treatment plant to Honey Hill would contravene this policy.

3.21 In terms of the additional survey questions which were attached to this round of consultation, in response to Q.7 (southern rural cluster) and Q.9 (villages) respondents suggested including more public benches and picnic tables, a changing art space, and creative features to make new development attractive places. There was also an expressed desire for new development to be designed for children and for new development to reflect village character. For Q.4 (Cambridge North-East), many comments emphasised the need for North-East Cambridge to have a good centre with amenities, for it to be a 'micro-city' within the city, or to incorporate a 'new' architectural style. Similar comments were expressed for Q.3 (Cambridge East) with some respondents requesting that the design uses a precedent of 'Garden City' design or include architecture which celebrates its aviation heritage.

3.22 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

### **New or updated evidence base**

3.23 Since the publication of the First Proposals Topic Paper in September 2021, several new documents and studies have strengthened the evidence base

supporting people- and place-responsive design. These additions reinforce the principles set out in the Cambridgeshire Quality Charter for Growth, particularly the core theme of Community, which promotes inclusive, healthy, and context-sensitive approaches to design in both urban and rural settings.

3.24 A notable example is the [Hackney Child-Friendly Places Supplementary Planning Document \(SPD\)](#) (Hackney Council, 2021), which demonstrates how child-friendly design can be successfully integrated into urban development without compromising the character of existing neighbourhoods. This aligns closely with Greater Cambridge's policy aims around inclusive design and community engagement. The SPD identifies several key principles relevant to the Greater Cambridge context:

- Empowering children and young people in the design process: Involving younger stakeholders in shaping local spaces enhances the inclusivity of design strategies and ensures that developments reflect the accessibility and lived experience of a broader user base. This is particularly relevant in areas with high occupancy rates among families and young people.
- Designing for safe, accessible and environmentally sustainable play: The SPD advocates for the provision of immediate access to play areas and community facilities—known as “doorstep” amenities. This approach promotes social interaction, improves well-being, and strengthens neighbourhood cohesion.
- Universal accessibility of public spaces: Public realm design should accommodate people of all ages and abilities, supporting principles of equity and inclusiveness. Well-designed, safe, and welcoming public spaces can enhance social integration and improve perceptions of safety, especially for groups with protected characteristics under the Equality Act.
- Promoting contact with nature: Everyday opportunities for interaction with green spaces are crucial. The Hackney SPD highlights the role of biodiverse, interconnected landscapes in improving mental health, reducing exposure to air pollution, and increasing resilience to climate change.

- 3.25 In 2024, the [Access to Nature for Teenage Girls in Cambridge](#) report, published by Women in Sport, offered new insight into how gender-specific experiences influence use of open space. Conducted in collaboration with Cambridge City Council, the report applied the COM-B model to better understand barriers and enablers for girls' engagement with nature and physical activity in public spaces (p.31):
- Capabilities – psychological and physical
  - Opportunities – social and physical
  - Motivation – automatic and reflective
- 3.26 Key findings indicate that addressing psychological, social, and physical factors in open space design can significantly improve girls' confidence, safety, and self-esteem.
- 3.27 Women in Sport's design goes further by setting out **eight principles for success** that could inform the design of inclusive parks, facilities, and wider public realm strategies:
1. No judgement – take pressure off performance and give freedom simply to play
  2. Invoke excitement – bring a sense of adventure and discovery
  3. Clear emotional reward – reframe achievement as moments of pride, not winning
  4. Open eyes to what's there – redefine sport as more than a school sport
  5. Build into existing habits – tap into existing behaviour in other spheres
  6. Give girls a voice and choice – allow girls choice and control to feel empowered
  7. Champion what's in it for them – make it about more than just health
  8. Expand image of what sporty looks like – create truly relatable role models which inspire.
- 3.28 This work was explored in collaborative workshops with the Cambridge City Council in October 2024 and showcases how evidence-based, community-informed design can lead to more inclusive and responsive policy-making. It

demonstrates the importance of knowledge-sharing and cross-sector collaboration, especially in shaping public spaces that are welcoming and empowering across different ages and demographics.

- 3.29 Together, these examples contribute to a growing body of national and local evidence that underscores the importance of placing people, especially underrepresented groups, at the heart of the design process. They reinforce the relevance of Greater Cambridge's policy GP/PP on People and Place Responsive Design, by highlighting how thoughtful, inclusive, and context-aware design contributes to the creation of healthier, safer, and more equitable places to live, work, and play.

### **Draft policy and reasons**

- 3.30 The draft policy can be viewed in the Draft Local Plan.

### **Additional alternative approaches considered**

- 3.31 No policy and relying on national guidance and the other policies in the plan. This was not considered a reasonable alternative due to the need to respond to local issues and national planning policy highlights that development plans should be proactive in their approach to achieving high quality development outcomes. In addition, consultation responses at First Proposals requested clarification on how evidence of sustainable development should be demonstrated as part of planning applications in Greater Cambridge.

### **Response to main issues raised in representations**

- 3.32 Paragraph 96 of the NPPF (December 2024) states that planning policies and decisions should be considered to be 'healthy, inclusive, and safe places to be'. The core ambition of Policy GP/PP, to promote place-responsive and people-centred development, was widely endorsed by individuals, developers, public bodies, and community groups. Respondents emphasised that good design should go beyond appearance, and encompass the way spaces function, how

they are experienced by different groups, and how they respond to local character. This approach is consistent with the Policy GP/PP's expression to ensure that development in both urban and rural areas responds positively to its physical, cultural, and community context. Therefore, opting to remove this policy on inclusivity and place-based approach to planning and relying solely on Building Regulations and design codes would disturb with both national policy requirements and the Local Planning Authority's legal obligations.

- 3.33 The council acknowledges comments in relation to repetitive and monotonous design that can be promoted through a single overarching policy for Greater Cambridge. Policy GP/PP requires a balance by requiring responsiveness to context without prescribing uniformity. Flexibility is retained where proposals demonstrate a high standard of design that positively contributes to local character. Councils maintain that high-quality design is relevant across all scales of development. While large-scale schemes may be supported through detailed design codes, smaller proposals still need to demonstrate responsiveness to local context.
- 3.34 Historic England concerned the need for care in protecting key views and approaches. The Councils are committed to maintaining the character and heritage of Cambridge and agree that tall buildings require careful assessment through the Greater Cambridge Townscape Characterisation Study (2025), which provides guidance on local character to assist with identification of appropriate density. A tall buildings policy has also been included in the draft plan.
- 3.35 The importance of engaging with local communities to improve the design of places was another key theme. Many respondents called for participatory approaches in the creation of design codes and masterplans. This is strongly supported by the Councils, who recognise that community input is vital to shaping places that reflect local identity, values and needs. Evidence from authorities, evidence is the 2024 Access to Nature for Teenage Girls in Cambridge report, produced by Women in Sport in partnership with Cambridge City Council. This study applied the COM-B model to better understand how gender-specific

barriers, such as perceptions of safety, lack of peer support, or poorly designed public space, can limit teenage girls' engagement with outdoor environments. These insights directly support the aims of Policy GP/PP, and the Councils will consider how future guidance can reflect these principles through practical design requirements and reinforced by the Sustainability Statement Requirements.

### **Further Work and next steps**

- 3.36 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## 4. Policy GP/QD Achieving High Quality Development

### Issue the Plan is seeking to respond to

4.1 The Greater Cambridge Local Plan will need to outline expectations of how all new development, including buildings being altered or extended, are carefully designed to create high quality design informed by a thorough understanding of the context.

### How the issue was covered in the First Proposals consultation

4.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: [Policy GP/QD: Achieving High Quality Development | Greater Cambridge Shared Planning](#).

4.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail: [Great Places Topic Paper 2021](#).

### Policy context update

#### National Planning Policy Framework (NPPF, December 2024)

4.4 The development from the 2021 to the 2024 NPPF suggests that there are certain key updates emphasising:

- Enforcing design quality
- Requiring clear visual documentation and material specification
- Elevating national design standards (National Model Design Code)
- Reinforcing the importance of community engagement and sustainable, adaptable design.

4.5 Implementing a clear and strengthened design is a key element in the delivery of sustainable development, which is a core principle of both the NPPF (2021) and NPPF (2024). These changes enhance the legal and policy basis for demanding high design standards, as your policy outlines. If you're updating local policies or assessing compliance, referencing these new NPPF clauses (particularly paras 137–140) will help strengthen justification for design-led development outcomes.

4.6 Paragraph 137 of the NPPF (2024) pursues a new requirement where applicants must now “provide sufficient information to demonstrate” how their proposals meet design expectations. This supports the emphasis on early, transparent design justification which aligns with GP/QD's requirement for comprehensive design approaches and community-oriented design.

4.7 Paragraph 138 explicitly states that the National Model Design Code is the primary basis for the preparation and use of local design codes. This prioritises the status of national design principles which encourages consistency and quality in planning proposals to align with robust design codes that integrate topography, townscape, layout, and functional needs such as cycle/refuse storage.

4.8 Paragraph 140 introduces the requirement on design quality enforcement and clarity on plans and drawings. These cover matters relating to design quality dilution post-permission, due non-comprehensive understanding of character and context which can ensure safe and healthy places are created that support inclusivity and well-being.

### **Planning Practice Guidance - Design: process and tools**

4.9 Provides advice on the key points to take into account on design with reference across to the National Design Guide and National Model Design Code and related Guidance Notes for Design Code.

### **National Design Guide (January 2021)**

4.10 The National Design Guide reaffirms the importance of fundamental principles of good design by identifying the qualities of ‘fit for purpose, durable and bringing delight’. It applies to all scales of development that will create change in the built

and natural environment and underpins the importance of well-designed and well[1]built places and the communities that influence and sustain them. The Guide identifies ‘Ten characteristics’ of context, identity, built form, movement, nature, public spaces, uses, homes & buildings, resources and lifespan that are influenced by three core themes of character, community and climate. Crucially at Paragraph 21, The Guide identifies that ‘a well-designed place is unlikely to be achieved by focussing only on the appearance, materials and detailing of buildings.’

### **National Model Design Code (2021)**

4.11 The National Model Design Code sets a baseline standard of quality and practice which local planning authorities are expected to take into account when developing local design codes and guides and when determining planning applications, including:

- The layout of new development, including street pattern
- How landscaping should be approached including the importance of streets being tree-lined
- The factors to be considered when determining whether façades of buildings are of sufficiently high quality
- The environmental performance of place and buildings, ensuring they contribute to net zero targets
- That developments should clearly take account of local vernacular and heritage, architecture and materials.

4.12 This is supported on the NPPF that references it at Paragraph 133 (Section 12) and makes it clear that creating high quality buildings, suggesting this reinforcement of accountability in design and centralisation of design quality standards.

### **Summary of issues arising from First Proposals representations**

4.13 Many respondents expressed support for the policy.

- 4.14 A few developers specifically welcomed the policy's encouragement of mixed-use proposals. Croydon Parish Council expressed their desire to keep the landscape rural and the Trumpington Residents Association stressed the importance of delivering high quality buildings and enforcing planning conditions.
- 4.15 Some comments highlighted the need for planning to avoid creating bland developments. There were many suggestions to improve the policy, some included introducing additional architectural design standards, on-street parking provision, Passivhaus standards, crime prevention measures. Some respondents stated that design codes should reflect local building typologies, topography and that the policy should ensure that the use of previously developed or underutilised sites in the urban area can be maximised. Some comments stated that design guides shouldn't be imposed on small developments where other mechanisms could achieve similar outcomes. One developer stated that if a development meets the policy's objectives, the policy should ensure that this carries significant weight in the determination of the proposal.
- 4.16 Some respondents questioned whether it is unusual to have two design policies in the Local Plan and whether it could be covered in one policy. The Wildlife Trust also asked that the Building with Nature standards referred to in policy BG/GI are formally incorporated as a requirement into this policy or GP/QP. Historic England asked for a separate policy relating to tall buildings. Other respondents noticed that parking is referenced twice in the policy under 'climate-positive' and 'local character' and it does not need to be repeated. Some respondents asked for clarification to be provided within the policy as to what is regarded as 'significantly taller' to understand when additional assessment will be required.
- 4.17 Some developers supported the policy and asserted that their sites could deliver the policy's objectives. Other comments highlighted specific sites or proposals that they considered would not meet the policy objectives.

4.18 In terms of the additional survey questions, there were a high number of representations which emphasised the importance delivering high quality development. Such representations can be found in response to Q.3 (Cambridge East), Q.4 (Cambridge North-East), Q.5 (Addenbrookes), Q.6 (Cambourne), Q.7 (southern rural cluster), Q.9 (kinds of housing, jobs, facilities, or open spaces in villages) and Q.13 (aspirational vision for Greater Cambridge). In answer to Q.12 (what should we prioritise when planning homes for the future?), 64% of respondents expressed a desire for safe streets where children can play outside, 30% expressed a desire for accessibility and adaptability for wheelchair users and 51% expressed a desire for secure cycle parking.

4.19 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

### **New or updated evidence base**

4.20 No new or updated evidence.

### **Draft policy and reasons**

4.21 The draft policy can be viewed in the Draft Local Plan: [Link to the draft plan policy](#).

4.20 High quality design is a key principle in the creation of sustainable development and should contribute to making communities better for everyone. Good design is concerned not only with how development looks but how it feels and functions. A well-designed place is formed of streets, buildings and open spaces that are arranged to complement and work together. High quality development can encourage the interaction between people and place and can respond to the local character, materiality and the historic environment.

4.21 The Local Plan seeks to plan positively for high quality and inclusive design by creating places that function well and establish a strong sense of place with comfortable places to live, work and visit. The NPPF emphasises high quality

design and good amenity standards as a core planning principle, therefore, it is important that design principles are applied to new development.

4.22 Creating well designed places that incorporate all aspects of design in an inclusive manner can help to deliver a high quality of life. Therefore, GP/QD provides a framework for good design that contributes to improvements in crime prevention, access and inclusion, safe and connected streets and cohesive neighbourhoods.

4.23 Policy GP/QD encourages design that creates a sense of place and acknowledges local form and character, with the aim of development being to create new and exciting places where people want to live, work and visit. In this regard, design should be site specific.

4.24 The local character and distinctiveness of Greater Cambridge is derived from the diversity of architecture, landscape and setting. These have given rise to an architectural typology not just of farmhouses, picturesque cottages and churches, but historic collegiate buildings, open spaces such as the commons, greens and The Backs and large Victorian houses to the west of the city centre, railway-related development of the Newtown and Romsey areas, inter-war development to the south and west and the post-war suburbs of King's Hedges, Arbury, and Abbey wards.

4.25 To help facilitate the understanding of local character and to support development that acknowledges and enhances the essence of local character, it is important that the most appropriate information sources are referenced in relevant planning applications. Sources which may assist with identifying and assessing local character include Conservation Area Appraisals, Neighbourhood Plans and Village Design Guides and site-specific design codes.

## **Additional alternative approaches considered**

4.26 No policy and relying on national guidance and the other policies in the plan.

This was not considered a reasonable alternative due to the need to respond to local issues and national planning policy highlights that development plans should be proactive in their approach to achieving high quality development outcomes. In addition, consultation responses at First Proposals requested clarification on how evidence of sustainable development should be demonstrated as part of planning applications in Greater Cambridge

## **Response to main issues raised in representations**

4.27 The Councils acknowledge the critical importance of delivering high quality, inclusive, and sustainable development across Greater Cambridge. This ambition underpins the vision for the area and informs the objectives of Policy GP/QD. Achieving high quality development is not limited to aesthetics or individual buildings; it encompasses a wide range of considerations including placemaking, functionality, local character, climate resilience, biodiversity, accessibility, and the relationships between built form and open space. Support from policy 2018 local plan and of the adopted South Cambridgeshire local plan 2018.

4.28 There was particular support for the policy's focus on creating active, attractive and well-integrated places that reflect the identity of Greater Cambridge. Developers also expressed support for the policy's encouragement of mixed-use development, recognising the value of combining different functions in a way that enhances vibrancy and supports resilient communities. This aligns with the policy's aim to ensure proposals are designed with communities in mind and integrate successfully with surrounding uses.

4.29 A key theme raised was the need to avoid bland, generic development. Respondents called for a stronger design-led approach and highlighted the value of incorporating high-quality architectural detail, contextual materials, and sensitive street design. In response, Policy GP/QD draws upon the principles of the National Model Design Code (MHCLG, 2021), which provides a nationally

recognised framework for securing design quality through a place-based approach. This includes guidance on layout, street hierarchy, façade quality, environmental performance, landscape integration (including tree-lined streets), and use of local materials. These principles are supported in the National Planning Policy Framework (NPPF, 2024, paragraph 133), which reinforces the importance of design accountability and consistency in achieving high-quality development.

- 4.30 The Councils recognise the need for a proportionate and flexible approach. Therefore, Policy GP/QD provides an overarching framework, but allows for tailored design responses depending on the scale, skyline, context, and nature of the development. These expectations are supported by Appendix F of the Cambridge Local Plan (2018): Tall Buildings and the Skyline, which remains a key reference for evaluating proposals that may affect the character of Cambridge's skyline. Determining an appropriate design-led solution to high quality building development will need to be conducted on a case-by-case basis, accounting for the various growth opportunities and constraints.
- 4.31 Policy GP/QD has been drafted to ensure that applicants will provide details and benefits of the clarity, proportionality, and integration with other standards and guidance their proposals will bring and justification for the approaches to design and construction being proposed. This will be a key tool in delivering places that are sustainable, inclusive, distinctive, and enduring.

### **Further work and next steps**

- 4.32 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.
- 4.33 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## 5. Policy GP/HD: Housing density

### Issue the Plan is seeking to respond to

- 5.1 This policy provides guidance on density of development, such that proposals make best use of land, but also respond to their setting and location.

### How the issue was covered in the First Proposals consultation

- 5.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: [Policy H/HD: Housing density](#).
- 5.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail: [Homes Topic Paper 2021](#).

### Policy Context Update

#### National Planning Policy Framework (NPPF, December 2024)

- 5.4 An amended version of the NPPF was published in December 2024. Paragraph 130 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. Paragraph 109 advises plans should realise 'opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated'.

## **Summary of issues arising from First Proposals representations**

- 5.5 General support for the policy, with developers supporting that there is no specific density figure being required, seeking to make the most of sustainable sites, and noting that the policy adheres to NPPF.
- 5.6 It should be a design-led approach, appropriate to local circumstances, and that the drive for higher density should not override consideration of landscape, townscape and heritage impacts from inappropriately tall buildings.
- 5.7 Parish councils were concerned that rural and non-rural areas should not be the same density.
- 5.8 Lockdowns underscored the crucial role of green spaces and corridors for the mental and physical health, especially for those living in high density housing, and that the policy should ensure accessible green space provision and provide opportunities for food growing where private gardens are not provided.
- 5.9 Policy should be amended to require smaller units on higher density sites in town centres and close to transport interchanges and on small, constrained sites, as these are less suited to families.
- 5.10 Policy should allow room for extensions to help families adapt and remain within their homes and communities. Also, to address concerns that at higher densities parking and hard landscaping areas increase the risk of surface water flooding, that the policy should require use of permeable materials.
- 5.11 Wide ranging concerns included that there is a need for proper family homes with gardens, higher densities will create the 'slums of tomorrow' leading to anti-social behaviour, crime, anxiety and mental ill-health, that a lack of parking impacts on community cohesion, and that there have been poor schemes in the past, with the Cambridge Station area mentioned.

- 5.12 Concern that if densities are increased too much it might decrease the quality of life, and might impact the quality of the city, including its economic prospects as companies will not want to move here.

## **New or updated evidence base**

- 5.13 **Greater Cambridge Townscape Characterisation Study (2025)** – Provides guidance on local character to assist with identification of appropriate density. The study provides a high-level, desk-based assessment of the townscape character across the Cambridge urban area and 31 surrounding rural settlements. As Strand 1 of a wider commission, complementing Heritage Impact Assessments and the Skyline and Tall Buildings Strategy, the study serves as a foundational evidence base for informing planning policy, site allocations, urban design decisions, and as a tool for monitoring townscape change. By identifying and mapping distinct townscape typologies, such as historic cores, suburban housing types, and commercial areas, it offers a structured understanding of the area's built environment, including typical building forms, materials, and contextual building heights. This directly supports Policy GP/HD: Housing Density by enabling a design-led approach to development, where density is informed by local character, heritage context, and the capacity of an area to accommodate change. The study emphasises that housing proposals should not only make efficient use of land, as encouraged by national policy, but also respect the nuanced character of both urban and rural settings, helping to guide appropriate forms, scales, and densities of new development.

## **Draft policy and reasons**

- 5.14 The draft policy can be viewed in the Draft Local Plan.
- 5.15 At First Proposals stage, Policy GP/HD: Housing density was within the Homes chapter. In order for residential densities to be successfully applied, it is critical

that all aspects of placemaking are carefully considered holistically and therefore it is considered appropriate to include the policy within the Great Places chapter.

- 5.16 The adopted Cambridge and South Cambridgeshire Local Plans apply different approaches to housing densities, with the South Cambridgeshire Local Plan identifying specific average housing densities that new development should achieve, whereas the Cambridge Local Plan does not set any density requirements but requires development to take a context led approach.
- 5.17 The policy recognises that a context led approach to development is required to ensure the effective and most efficient use of land whilst carefully balancing the need for development to positively respond to local circumstances, including character, landscape and townscape setting. Nevertheless, opportunities to exceed local densities should be taken in appropriate locations, namely areas that are well served by active and public transport and local services and facilities. Appropriately designed higher density development can increase the vibrancy of an area and importantly the critical mass of people living within a neighbourhood or community. This can help support and sustain the main centres within Greater Cambridge including retail, community and cultural provision.
- 5.18 Higher density development requires careful consideration to prevent over-development of a site. Issues relating to over-development include the lack of adequate waste storage, poor outlook and amenity for residents and the over provision of one particular house size or type, such as studio or one bedroom flats. Therefore, the policy requires these matters to be addressed and demonstrated through the planning process to ensure high quality development is achieved.

### **Additional alternative approaches considered**

- 5.19 No policy and rely on national policy. This approach is not preferred because local guidance is needed to supplement national policy.

## **Response to main issues raised in representations**

- 5.20 The policy includes a design led approach, which can respond to local circumstances but also the need to uplift density in appropriate locations.
- 5.21 Concern that rural and non-rural areas should not be the same density has been addressed by ensuring appropriate issues are considered when determining density.
- 5.22 Policies elsewhere in the draft plan seek to ensure development is accompanied by green space and address the crucial role of green spaces.
- 5.23 The draft plan has policies on housing mix to ensure that needs are met overall, but there will be locations where a greater mix of smaller units are more appropriate.
- 5.24 Concerns regarding room for extensions to help families adapt and remain within their homes and communities – this has to be balanced against using land efficiently and providing homes where there is good access to public transport.
- 5.25 The draft local plan includes policies to ensure flood risk is properly considered, managed and mitigated, reflecting concerns for higher densities parking and hard landscaping areas that increase the risk of surface water flooding.
- 5.26 In relation to concern for impact on the quality of life with high density development not providing access to gardens. The policies set out higher density developments in the right places that can be delivered at a high quality, with a range of policies ensuring that sites are well designed and accompanied by access to green space, services and facilities for all.

## Further work and next steps

- 5.27 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.
- 5.28 The Councils intend to prepare additional evidence to identify suitable locations for higher density residential development. This will be informed by existing evidence such as the Greater Cambridge Townscape Characterisation Study as well as the draft policy approach of locating higher density development in close proximity to active and public transport provision and the main centres within Greater Cambridge.

## **6. Policy GP/ST: Skyline and tall buildings**

### **Issue the Plan is seeking to respond to**

- 6.1 This policy seeks to ensure that new tall buildings protect and enhance the skyline of Cambridge.

### **How the issue was covered in the First Proposals consultation**

- 6.2 Policy GP/ST is a new policy created following comments received during the First Proposals consultation. It was determined that a specific policy was needed to address tall buildings and the skyline.

### **Policy context update**

- 6.3 The national policy context from that which informed the First Proposals has changed. Section 12 of the NPPF sets out the core principles for good design and addresses the need to respond to the context and character of development through appropriate design. Section 16 also sets out conserving and enhancing the historic environment including setting of the heritage assets. Policies must give great weight to conservation and consider significant impact of building heights on the skyline in new developments.

### **Summary of issues arising from First Proposals representations**

- 6.4 A standalone policy was not proposed in the First Proposals.

### **New or updated evidence base**

#### **Tall Building Study**

- 6.5 Since the publication of the First Proposals, a new Skyline and Tall Buildings Baseline, Strategy and Guidance (2025) has been commissioned to support Policy GP/ST. This study provides a robust, evidence-based strategy to guide the future management of Cambridge's evolving skyline. Recognising that the skyline is a defining aspect of Cambridge's historic character and identity, the study establishes a spatial understanding of sensitivities, opportunities, and appropriate thresholds for building heights across the city and wider Greater Cambridge area. It outlines a

framework for identifying where taller buildings may be acceptable and the criteria that should apply in their assessment, particularly in relation to visual impact, townscape character, setting of heritage assets, and public benefit.

6.6 The strategy includes area-specific definitions of tall buildings, guidance for responding to local sensitivities, and a design-led approach to ensuring high-quality, contextually appropriate proposals. It also supports a pro-active and planned approach to accommodating sustainable growth, allowing new development to contribute meaningfully and proportionately to the skyline where appropriate. For example, it sets off as a starting point for tall building proposals and identify the defining characteristics and values associated with the location or for landscape impact it suggests that a zone of theoretical visibility of the proposed tall(er) building should be prepared to identify those parts of the landscape that may be affected. The study's methodology aligns with the NPPF (2024), which places great weight on conserving heritage assets and any challenges imposed to the latter should be addressed upon submission, while encouraging innovation where contextually justified.

#### [Healthy Places Joint Strategic Needs Assessment \(JSNA\)](#)

6.7 The Joint Strategic Needs Assessment (JSNA) for Cambridgeshire and Peterborough is produced jointly by Cambridgeshire County Council and Peterborough City Council in partnership with the local health system, providing a comprehensive analysis of the health and wellbeing needs of the population to inform strategic planning and service delivery. Around one third of suicides take place outside the home, in a public location of some kind.

6.8 'Preventing Suicide in Public Places' published by Public Health England sets out measures to reduce risk. Area 3 of the national strategy is concerned with reducing access to the means of suicide, which is identified as the area that local authorities can contribute to. Suicide prevention from Jumping means restriction interventions (e.g., barriers at bridges) have been shown to reduce frequency of suicides at the location by 91%. Examples include measures such as fencing with a minimum height of 2.5m tall buildings, inwardly curving tops to make it difficult to climb inwardly,

design will be determined by the nature of the structure and its surroundings. When submitting planning proposals for tall buildings developers should refer to part 3 of the preventing suicide strategy which provides guidance.

## **Draft policy and reasons**

6.9 The draft policy can be viewed in the Draft Local Plan.

6.10 Tall buildings were originally included within Policy GP/QD 'Achieving High Quality Development' which did not include specific criterion for suicide prevention measures associated with tall buildings. This matter is however highlighted in the Healthy Places Joint Strategic Needs Assessment (JSNA) and the draft policy responds to this.

6.11 Cambridge's skyline is a unique and valued asset, characterised by a limited number of tall buildings that contribute to the city's historic character. This is supported by the Tall Buildings Baseline, Strategy and Guidance (2025), where tall building can positively transform an area if well-designed and appropriately located, but poorly sited tall buildings can harm the city's identity and community acceptance.

6.12 With significant growth in population and development, including new neighbourhoods and urban extensions, there is increasing demand for taller buildings, often between five and ten storeys, that exceed the existing built form. While Cambridge City has policies managing tall buildings, South Cambridgeshire currently lacks comprehensive guidance. A coordinated tall buildings policy is therefore essential to protect and enhance the skyline, guide sustainable growth, and ensure developments respect the local context. This approach is supported by national guidance, including the National Model Design Code and Historic England's Advice Note 4, which advocate for evidence-based, place-sensitive design and location of tall buildings.

## **Additional alternative approaches considered**

6.13 No policy and rely on national policy.

## **Response to main issues raised in representations**

6.14 A standalone policy was not proposed in the First Proposals.

## **Further work and next steps**

6.15 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## **7. Policy GP/QP: Establishing high quality landscape and public realm**

### **Issue the Plan is seeking to respond to**

- 7.1 This policy sets out the Local Planning Authority's approach to high quality landscape and public realm within planning, including public art requirements.

### **How the issue was covered in the First Proposals consultation**

- 7.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: [Policy GP/QP: Establishing high quality landscape and public realm](#).
- 7.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail: [Great Places Topic Paper 2021](#).
- 7.4 Policy GP/QP set out the Council's requirements for the quality of design of landscape and public realm. The proposed policy direction covered themes: Enabling local communities; Enhance connectivity; Respond to climate, Integrate with local character. These would enable developers to demonstrate how their proposals met expectations.

### **Summary of issues arising from First Proposals representations**

- 7.5 Many respondents expressed general support for the policy.
- 7.6 There were various suggestions to improve the policy. Many comments focussed upon improving the quality and experience of public spaces through the introduction of Home Zones, Low Traffic Neighbourhoods and the principles of the 15-Minute City. Trumpington Residents Association (TRA) and others commented on the quality of the existing streetscape, the capacity of the streets

and spaces within the city and their overall maintenance. Cambridge and South Cambridgeshire Green Parties argued that footways need to be more porous for pedestrians but also protect them from motorised vehicles. The same respondent asked how the Local Plan will treat anti-terror architecture.

7.7 Metro Property Unit Trust suggested narrowing the policy's scope to ensure that developments should just be landscape-led, but also respond to other design, land-use and landscape considerations. Contrastingly, the Royal Society for the Protection of Birds Cambridgeshire/ Bedfordshire/ Hertfordshire Area suggested expanding the scope of the policy to include local landscape and habitats and the need to prevent the introduction of new, or expansion of existing invasive species. The Wildlife Trust considered that the Building with Nature standards referred to in Policy BG/GI should be formally incorporated as a requirement into this policy or another appropriate policy such as GP/QD. A few developers questioned how the last bullet point of the policy, 'appropriate types of open space' will be tested, measured, and applied.

7.8 In terms of the additional survey questions, in relation to Q.7 (southern rural cluster) and Q.9 (kinds of housing, jobs, facilities, or open spaces to include in villages) there were a number of suggestions, including an expressed desire for new development to be designed for children and a wish to make new development reflect village character. In relation to Q.4 (Cambridge North-East), a high number of respondents expressed a desire for green spaces, tree, etc. to be included in the design of the site. Similar aspirations were expressed in response to Q.5 (Addenbrookes), Q.6 (Cambourne), Q.7 (southern rural cluster), Q.9 (kinds of housing, jobs, facilities, or open spaces to include in villages) and Q.13 (the broad aspirational vision for Greater Cambridge). In terms of enhancing connectivity, respondents expressed support in relation to Q.3 (Cambridge East), Q.4 (Cambridge North-East), Q.6 (Cambourne), Q.7 (the southern rural cluster), Q.9 (the villages) and Q.13 (the broad aspirational vision for Greater Cambridge). There were particularly detailed representations expressing a desire to improve connectivity in Addenbrookes which was linked to Q.5 (Addenbrookes).

- 7.9 Specific comments in relation to public art were not made during the first stages of this consultation process. Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

## **Policy context update**

### **National Planning Policy Framework (NPPF, December 2024)**

- 7.10 An amended version of the NPPF was published in December 2024. Chapter 12. Achieving well-designed places Paragraph 132 of which sets out that:
- 7.11 'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers'.

## **Summary of issues arising from First Proposals representation**

- 7.12 Specific comments in relation to public art were not made during the first stages of this consultation process.

## **New or updated evidence base**

- 7.13 **Draft Planning Obligations SPD:** The Council has produced a Draft Planning Obligations SPD Chapter 12 provides guidance for developers and decision makers for the delivery of public art requirements for all major development. It is anticipated that the SPD will be adopted by the Council late 2025.

- 7.14 **Healthy Places Joint Strategic Needs Assessment (JSNA)**: The Joint Strategic Needs Assessment (JSNA) for Cambridgeshire and Peterborough is produced jointly by Cambridgeshire County Council and Peterborough City Council in partnership with the local health system, providing a comprehensive analysis of the health and wellbeing needs of the population to inform strategic planning and service delivery. For Policy GP/QP, which guides the delivery of high-quality landscape and public realm including public art, the JSNA underscores the need for holistic, inclusive design that promotes healthy, age-friendly, and accessible environments. It also supports fostering social cohesion, building strong community networks and a sense of belonging, as a key factor in wellbeing. The JSNA's recommendations, such as incorporating lifetime homes standards and establishing quality review panels for major developments, provide a framework to ensure that new developments contribute positively to the health, social fabric and neighbourhood art of Greater Cambridge communities. Policy should also include to provision of accessible and age-appropriate equipment such as seating and play equipment that will result in a positive impact on health and well-being for its intended user.

### **Draft policy and reasons**

- 7.15 The draft policy can be viewed in the Draft Local Plan.

### **Further information supporting draft policy approach**

- 7.16 Public realm is space freely and publicly accessible to all, including streets, squares, forecourts, parks and open spaces. This comprises of primarily public land, although includes publicly accessible privately owned and managed land that is designed in such a way that it welcomes and encourages public movement into and through it.
- 7.17 In general terms, public realm can be considered as all squares, pavements, and parks under public ownership/jurisdiction, inclusive of their access. Public realm does not include any space for which an admission fee is taken,

consecrated ground for the use of burial or space solely for the use of motor vehicles.

- 7.18 High quality public realm and green infrastructure can deliver a multitude of benefits to people and nature, helping to improve people's mental and physical health and well-being, support and encourage active travel, reduce Urban Heat Island Effect, manage flooding and water run-off, improve microclimate, support climate change resilience, improve ecology through the diversity of flora and fauna, improve social value, social cohesion and sense of place.
- 7.19 Public realm is an essential part of everyday life and is inseparable from the economic performance of the Greater Cambridge area. It brings prosperity to the area by bringing activity and interaction to a place, boosting productivity, footfall, and engagement. In addition to this, public art plays a vital role in the public realm as it contributes significantly to placemaking, identity, and community engagement
- 7.20 Public art has the ability to enhance the visual and cultural quality of spaces, making them more welcoming, distinctive, and reflective of local character. It can reinforce a sense of place, celebrate heritage, and encourage social interaction, thereby promoting more inclusive and vibrant communities. Its key characteristics are site-specificity and accessibility and it enables art to be experienced by a broad audience outside of a gallery setting. It may include physical installations, digital works, or participatory projects, depending on context and purpose.
- 7.21 The Councils emphasise the importance of best practice in commissioning public art. Successful projects should be ambitious, high-quality, and relevant to their context, engaging the wider community, including underrepresented groups. Delivery should involve a three-way partnership between the developer, a qualified art consultant, and the Council, supported by meaningful community consultation.

- 7.22 Public art must be original, led by artists or craftspeople (local where possible), and reflect evolving practices, such as digital and web-based projects, where appropriate.
- 7.23 All major developments, defined as residential proposals of 10+ dwellings or non-residential schemes creating 1,000m<sup>2</sup> or more of floorspace, must include provision for public art. Outline applications must include a Public Art Strategy with an indicative budget. Full or Reserved Matters applications must include a detailed Public Art Delivery Plan.
- 7.24 Where public art is secured via a Section 106 agreement, it should include a commuted sum based on the complexity and timeline of delivery, as outlined in the relevant Public Art Strategy or Delivery Plan. This ensures the Council can provide the expertise necessary for oversight and successful implementation.
- 7.25 In line with national guidance, 1% of total build cost is the expected minimum contribution for public art and culture in major developments. This 1% figure serves as a starting point for negotiation, particularly for large or complex sites, where bespoke arrangements may be required.
- 7.26 For projects with capital construction costs exceeding £10 million (i.e. where the 1% contribution exceeds £100,000), a S106 obligation will be used to secure a Public Art Strategy or Delivery Plan.
- 7.27 Where the 1% value is below £100,000, public art will typically be secured via a planning condition.
- 7.28 In some cases, public art contributions may not meet the policy tests outlined in NPPF Paragraph 58: being necessary, directly related to the development, and proportionate. Where viability is a concern, exemptions will be considered on a case-by-case basis, taking into account policy objectives and the broader planning balance.

7.29 Cambridge City Council and South Cambridgeshire District Council have both produced a range of public documents to guide the appropriate design and delivery of public art. Key references include:

- [Cambridge City Council's Public Art SPD \(2010\)](#) and [South Cambridgeshire Public Art SPD \(2009\)](#) – offers further localised direction.
- [The Cambridge Perspective: A Manifesto - Cambridge City Council](#) – "The Cambridge Perspective: Art, Artists, Community, Place, Change", a public declaration affirming the city's commitment to integrating art into community and place-making.
- [South Cambridgeshire's District Design Guide SPD \(2010\)](#) – particularly paragraphs 6.54 to 6.61 – provides detailed guidance for delivering public art.

7.30 The emerging [Planning Obligations SPD](#), once adopted, will provide the framework for securing public art contributions through the planning process.

### **Additional alternative approaches considered**

7.1 A standalone public art policy has been considered; however, it is thought that criteria within design policy, accompanied by supporting text with sign posting to more detail and supporting documentation is a better solution.

### **Response to main issues raised in representations**

7.2 The council acknowledges the widespread support for Policy GP/QP, which seeks to ensure the delivery of high quality landscape and public realm in Greater Cambridge, including the incorporation of public art. Several respondents highlighted the importance of enhancing public spaces by adopting innovative urban design principles such as Home Zones and Low Traffic Neighbourhoods. The Council recognises these approaches as valuable strategies to improve the quality, safety, and connectivity of streets and public spaces, particularly through the promotion of public art.

- 7.3 The concerns raised by the Green Parties about pedestrian permeability and protection from motorised vehicles are reflected in the policy's emphasis on inclusive, safe, and accessible environments. The Local Plan will continue to consider these factors within its design guidance, including the management of security and anti-terror measures, which will be balanced carefully with public realm quality and accessibility.
- 7.4 Regarding the policy's scope, the Council notes the contrasting views expressed. While Metro Property Unit Trust suggested narrowing the focus to landscape-led development, the Royal Society for the Protection of Birds and The Wildlife Trust recommended expanding the scope to encompass biodiversity, local habitats, and invasive species management. The Council recognises the importance of these environmental considerations and will ensure relevant standards, such as Building with Nature, are either formally integrated into this or complementary policies like GP/QD, to ensure a holistic approach to landscape and biodiversity. As stated in the Cambridge City Council Public Art SPD (2021), the Council is committed to working with stakeholders to implement the policy effectively, where public art requirements remain a priority to improve the Greater Cambridge's landscape and public realm meet the highest standards of quality, inclusivity, and sustainability.

### **Further work and next steps**

- 7.5 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## **8. Policy GP/LC: Protection and enhancement of landscape character**

### **Issue the Plan is seeking to respond to**

- 8.1 Greater Cambridge has a subtle yet rich and varied landscape, consisting of intimate river valleys, open fens, wooded claylands and ridges and rolling chalk hills, which provides the setting for Cambridge and the villages in South Cambridgeshire. The Local Plan needs to ensure the varied character of different parts of the area is properly considered in planning decisions and the subtle richness of the landscape is respected. Developments should respond to the local landscape character and take opportunities for enhancement through a process of landscape evaluation, consideration and reference to the Greater Cambridge Landscape Character Assessment (2021) and other relevant guidance.

### **How the issue was covered in the First Proposals consultation**

- 8.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: [Policy GP/LC: Protection and enhancement of landscape character](#).
- 8.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail: [Great places topic paper](#).

### **Summary of issues arising from First Proposals representations**

- 8.4 Many respondents generally supported the policy direction.
- 8.5 Some suggestions were made to the policy wording including requests for more clarity to identify what makes green gaps 'important'. Some respondents identified areas of particular landscape value that should be protected such as the green corridors around the River Cam, River Great Ouse, Hobson's Brook

and West Cambridge and the landscape south of Cambridge Biomedical Centre around White Hill. A few developers and landowners wanted the policy to allow for the consideration of development on its own merits and asked that the policy recognised the positive impact that development can have upon the character of landscapes. There were also requests for new developments to retain and enhance landscape features that have particular value, rather than retain all landscape features.

- 8.6 Cambridge Past, Present and Future argued that similar Local Plan policies had not been effective at protecting the setting of Cambridge from the cumulative impact of development and that the policy should require the planting of trees early to improve the screening of the city. The Campaign to Protect Rural England (CPRE) also expressed a wish that the policy would prevent visually intrusive developments occurring. Contrastingly, Metro Property Unit Trust argued that the policy needed to ensure that the protection of trees is measured against other elements of the proposal. North Newnham Residents Association provided a number of comments relating to how the policy should protect and enhance hedges.
- 8.7 Historic England (HE) commented that views from the south and east of the city are being underplayed as a characteristic of the city and suggested that Heritage Impact Assessment should look at this issue. HE also argued that the policy should ensure that new development positively responds to Cambridge's historic landscape. Natural England stated that locally designated landscapes should be identified within the plan and given policy protection.
- 8.8 Some respondents argued that specific site proposals in the First Proposals would not be in line with this policy, in particular sites at Babraham, Sawston, and there was reference to Anglian Water's proposal at Honey Hill. Developers such as TOWN, argued that the policy will need to recognise the strategic objectives of the North East Cambridge Area Action Plan and avoid imposing conditions that could unreasonably restrict development.

- 8.9 Some respondents including some Parish Councils argued that Important Countryside Frontages (ICFs) are an important policy tool for protecting villages, whereas other respondents saying they were an unnecessary additional layer of constraint to development. Some respondents asked for additional ICFs, whereas other respondents asked for ICFs to be removed.
- 8.10 In terms of the additional survey questions, there were a high number of representations in response to Q.4 (Cambridge North-East) which supported the protection of existing natural and landscapes, or provision of new green spaces. In response to Q.7 (southern rural cluster), Q.8 (villages), Q.13 (aspirational vision for Greater Cambridge), there were some representations which expressed support for protecting Greater Cambridge's landscape and there were concerns that new development could harm existing landscapes.
- 8.11 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

### **Policy context update**

- 8.12 There are no changes in the new NPPF (2024) to the sections relating to landscape that are referred to in the Greater Places Topic Paper (2021) other than the paragraph numbering has changed.
- 8.13 Similarly, there have been no changes to national policy guidance or local policy context from that which informed the First Proposals and is set out in the Great Places Topic Paper (2021).

### **New or Updated Evidence base**

#### **Protected Open Space Review (2025)**

- 8.14 The Protected Open Space review is a desk-based review which demonstrates that the open spaces identified for protection are reasoned and justified by meeting the relevant policy criteria. Part of the review looks at Important

Countryside Frontages (ICFs), evaluating sites against the policy criteria to determine their continued suitability for designation as an ICF.

- 8.15 All the existing ICFs from the South Cambridgeshire Local Plan 2018 continued to pass the two tests to warrant designation as an ICF. The review identified and recommended amendments to both reduce and extend the extent of a small number of ICFs. The designated ICFs within the Draft Local Plan have been updated to reflect these recommended amendments.

## **Draft policy and reasons**

- 8.16 The draft policy can be viewed in the Draft Local Plan.
- 8.17 In line with national policy, the Local Plan needs to conserve and enhance the landscape and ensure that new development is sympathetic to local landscape character. The policy follows a 'character-based approach' based upon the Greater Cambridge Landscape Character Assessment (GC LCA) (2021). This approach was followed as it recognises the character, diversity and natural beauty of all landscapes across the whole of Greater Cambridge rather than a 'local landscape designations approach' which identifies and focuses on specific areas of greater landscape value.
- 8.18 The GC LCA looked in detail at the physical and human/cultural influences that have shaped the evolution and character of the landscape and identified 33 different Landscape Character Areas with a distinct local identity and sense of place. Detailed information is provided about each, including the condition of the landscape, key sensitivities and guidance on landscape management and integrating development into the landscape. The policy requires that new development proposals protect, conserve and enhance the local landscape character as set out in the GC LCA and in this way the Local Plan will ensure that the varied landscape character of different parts of the area is properly considered in planning decisions and that developments respond to the local

landscape character and take opportunities to conserve and enhance the landscape. This provides a comprehensive approach for considering landscape character across the whole of Greater Cambridge.

- 8.19 The cumulative impact of developments and incremental change on landscape character will also need to be taken into account in planning decisions, again with reference to the information in the GC LCA which sets out the key characteristics of the landscape and specific landscape sensitivities. New development should always make every effort to retain and enhance landscape features such as trees, woodlands, hedges, ponds, ditches, walls etc, particularly where they have been highlighted within the GC LCA. It is important to retain and enhance such features because they positively contribute to the landscape quality and character of an area but the majority of these features will also be important for biodiversity. In line with representations received, the policy has been made clear that it relates to landscape features that positively contribute to the quality and character of the area.
- 8.20 New development can provide opportunities to enhance the landscape, such as improving the edges of settlements. The edges of Cambridge and the villages are an important area of transition which require sensitive landscaping to protect the setting of the settlements and to provide a well-defined edge which respects townscape and the countryside beyond. In Cambridge, the green corridors, River Cam corridor and well vegetated edge are key features to be protected and enhanced and require high quality, sensitive landscaping. The aim at the edge of the villages in South Cambridgeshire is to create edges that are softened with vegetation, and any new development in these locations provide an opportunity to enhance this.
- 8.21 The South Cambridgeshire Local Plan (2018) identified Important Countryside Frontages which are where land with a strong countryside character penetrates into a village or separates two parts of the built-up area of a village. The frontage where this interface particularly occurs is identified to indicate that the frontage and the open countryside beyond should be kept open and free from

development. These areas are an important part of village character and therefore warrant continued protection and have been taken forward in this policy. A study has been carried out to look at the existing ICFs and consider whether they still meet the requirements (included in the Protected Open Space study as Appendix 2 to the Biodiversity and Green Spaces Topic Paper).

- 8.22 At First Proposals the policy direction included the protection of important green gaps such as between Longstanton and Northstowe. This was to enable a continuation of Policy NH/1 in the South Cambridgeshire Local Plan (2018) which protects the areas of countryside between Longstanton village and the new town of Northstowe. Representations were received about green gaps at First Proposals asking what makes a green gap 'important' and where they are located. On further consideration, the gap between Longstanton and Northstowe was a specific consideration in the development of Northstowe and will be continued through reference to this in the Northstowe policy. There are no other gaps that need to be specifically protected from a landscape point of view and so there is no reference to this in the policy.

### **Additional alternative approaches considered**

- 8.23 No additional alternative approaches identified.

### **Response to main issues raised in representations**

- 8.24 Many comments were received in relation to the protection of specific areas of landscape value. A 'character-based approach' has been followed for the policy based upon the Greater Cambridge Landscape Character Assessment (GC LCA) (2021). This approach has been followed as it recognises the character, diversity and natural beauty of all landscapes across the whole of Greater Cambridge rather than a 'local landscape designations approach' which identifies and focuses on specific areas of greater landscape value.
- 8.25 As explained above, the reference to important green gaps made at First Proposals was in response to continuing Policy NH/1 in the South

Cambridgeshire Local Plan (2018) which protects the areas of countryside between Longstanton village and the new town of Northstowe. It was considered that there are no other specific green gaps that are important from a landscape point of view and that it is unnecessary to include this as part of the policy. The continuation of the protection of the gap between Longstanton and Northstowe is included within the Northstowe policy.

- 8.26 The policy seeks to protect, conserve and enhance the landscape and recognises that development can provide opportunities for this. It has been drafted to recognise that landscape features that positively contribute to the quality and character of the area should be protected, conserved and enhanced, responding to a comment that not all landscape features have value.
- 8.27 The policy has a clause relating to the cumulative effects of development to avoid incremental harm to local landscape character. Policy BG/TC: Tree Canopy Cover and the Tree Population requires additional tree planting and the protection of trees and hedgerows.
- 8.28 The GC LCA looked in detail at the physical and human/cultural influences to identify the Landscape Character Areas including the consideration of historic landscape character. This is therefore an intrinsic part of the description of each Landscape Character Area and the landscape sensitivities and landscape guidelines provided in the GC LCA, and which should be considered in new development proposals. With regards to Heritage Impact Assessment (HIA), the methodology for carrying out HIAs in Greater Cambridge recognises the importance of all strategic views across and within the city. Through the Skyline and Tall Buildings Strategy, the viewpoints are being updated in consultation with Historic England, including dynamic views.
- 8.29 With regards to criticism of existing development proposals, all applications are subject to landscape character policies in the adopted Cambridge and South Cambridgeshire Local Plans (2018). These policies refer to older studies and the more recent 2021 GC LCA is also used in the consideration of development

proposals as an updated piece of evidence that covers the whole of Greater Cambridge . The identification of sites within the Local Plan has followed a rigorous approach to site assessment, set out in the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA). The sites were assessed against a wide range of criteria including landscape and townscape, carried out by landscape architects.

- 8.30 Responses to representations regarding Important Countryside Frontages are included in the Protected Open Space study, which is Appendix 2 to the Biodiversity and Green Spaces Topic Paper.

### **Further work and next steps**

- 8.31 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## 9. Policy GP/HE Historic Environment

### Issue the Plan is seeking to respond to

- 9.1 This policy sets out the Local Planning Authority's strategic approach to the historic environment within planning, including Heritage Impact Assessment requirements.

### How the issue was covered in the First Proposals consultation

- 9.2 Policy GP/HE is a new policy created following comments received during the First Proposals consultation in relation to Policy GP/HA. Representations highlighted that the Greater Cambridge Local Plan should include a strategic direction for the historic environment, particularly given Greater Cambridge's notable historic character.
- 9.3 Policy GP/HE seeks to provide a strategic policy foundation for policies in the Local Plan in line with national planning policy requirements.

### Policy context update

#### National Planning Policy Framework (NPPF, December 2024)

- 9.4 An amended version of the NPPF was published in December 2024. Chapter 16 of the NPPF (Paragraph 203) continues to highlight that local plans should set out 'a positive strategy for the conservation and enjoyment of the historic environment', taking into account:
- the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
  - the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
  - the desirability of new development making a positive contribution to local character and distinctiveness; and
  - opportunities to draw on the contribution made by the historic environment to the character of a place.

## **Summary of issues arising from First Proposals representations**

- 9.5 Historic England provided substantial comments in response to Policy GP/HA, which included various suggestions. Of particular note were comments that the initial policy approach set out in the First Proposals was too focused on the City and more needed to be done to recognise heritage across Greater Cambridge in a holistic way.
- 9.6 Historic England suggested that the Councils should provide a positive strategy for the historic environment and include a strategic policy for the pattern, scale and quality of development, and the conservation and enhancement of the natural, built and historic environment. Other commenting parties considered more could be done to recognise the value of heritage beyond designated heritage assets.

## **New or updated evidence base**

- 9.7 No new or updated evidence.

## **Draft policy and reasons**

- 9.8 The draft policy can be viewed in the Draft Local Plan.

## **Further information supporting draft policy approach**

- 9.9 Greater Cambridge's historic environment is central to its identity, quality of life and sense of place – it is an irreplaceable part of the region's cultural identity. The policy recognises that the conservation of the historic environment brings wide-ranging social, economic, environmental and cultural benefits. As such, the historic environment is a critical contributor to sustainable development and long-term community well-being across Greater Cambridge.
- 9.10 The requirement for a proportionate Heritage Impact Assessment for development proposals that may affect heritage assets or their settings ensures that applicants and decision-makers have access to robust, evidence-based

information about the significance of the assets in question and the potential impact of proposed changes. This approach reflects best practice as outlined within the NPPF; the emphasis on clear and convincing justification for any harm, regardless of the level of harm, is grounded in national policy. By requiring harm to be weighed against demonstrable public benefits, the policy reinforces the principle that the historic environment is not a barrier to development, but a key factor in ensuring high-quality growth.

9.11 There are databases that provide details of archaeological sites, listed buildings, historic landscapes and areas of archaeological interest in Greater Cambridge, which provide important evidence to support strategic policies that concern the historic environment:

- [The National Heritage List for England](#) provides a full record of listed buildings, registered parks and gardens, and scheduled monuments in England. This list is maintained by Historic England.
- [Cambridgeshire's Local Heritage List](#), which is maintained by Cambridgeshire County Council, provides details of non-designated heritage assets across Cambridgeshire.
- The [Cambridgeshire Historic Environment Record](#) is also maintained by Cambridgeshire County Council and provides the most comprehensive record of archaeological findings in Cambridgeshire.

### **Additional alternative approaches considered**

9.12 No policy and rely on national policy. This was not the preferred approach because the creation of a local historic environment strategy should be undertaken by the Local Planning Authority, as reflected by Paragraph 203 of the National Planning Policy Framework, which states that Local Plans should 'set out a positive strategy for the conservation and enjoyment of the historic environment'.

## **Response to main issues raised in representations**

- 9.13 Heritage assets play an important part in the local character and identity of the district, and it is important that both designated and non-designated heritage assets are recognised, protected and wherever practical enhanced by development. Therefore, in refining the Local Plan's approach to the historic environment, the Councils have prepared Policy GP/HE as a means of ensuring the historic environment is considered holistically through a strategic policy framework.
- 9.14 This overarching policy sets out the heritage strategy, alongside broader principles of conservation.
- 9.15 GP/HE address concerns raised in representations regarding HIAs by ensuring that applications have to submit a thorough, comprehensive and proportionate Heritage Impact Assessment, which considers the cumulative impacts, heritage significance and opportunities for enhancement.

## **Further work and next steps**

- 9.16 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## 10. Policy GP/HA Designated Heritage Assets

### Issue the Plan is seeking to respond to

- 10.1 This policy will support the management of development across Greater Cambridge that involves the alteration, extension or change in the use of designated heritage assets, or affects their setting, including listed buildings, Conservation Areas and registered parks and gardens.

### How the issue was covered in the First Proposals consultation

- 10.2 A policy approach was proposed in the First Proposals consultation under the policy Policy GP/HA: Conservation and enhancement of heritage assets. However, during the drafting process and in response to feedback received through the consultation, it was considered that the policy would be more effective split into a number of policies addressing Designated Heritage Assets and Non-designated heritage assets. The Proposed approach and full representations received can be viewed using the following link: [GP/HA Designated Heritage Assets](#).
- 10.3 The First Proposals Consultation was supported by topic papers which explored the context, evidence and potential alternatives and the preferred approach in greater detail. This can be viewed using the following link: [Greater Places: Topic Paper](#).

### Policy Context Update

#### [National Planning Policy Framework \(NPPF, December 2024\)](#)

- 10.4 Chapter 16 of the NPPF sets out national policies on conserving and enhancing the historic environment, including in relation to designated heritage assets. An amended version of the NPPF was published in December 2024, though there were no substantive updates to the historic environment policies.

## Summary of issues arising from First Proposals representations

- 10.5 The comments from the first proposals of the Local Plan express broad support for the inclusion of a heritage policy, however some comments raised concerns about the policy's current scope and effectiveness. A central issue raised is the overly narrow focus on designated heritage assets within Cambridge city, with comments made about the insufficient attention currently being given to the heritage significance of surrounding villages, non-designated assets, and wider historic landscapes. Respondents felt that the policy failed to reflect the full richness of the historic environment, including intangible heritage, and lacks references to key resources such as the Cambridgeshire Historic Environment Record and local Conservation Area Appraisals.
- 10.6 Many comments highlighted the need for a more holistic and strategic approach to heritage across the entire Local Plan. It was suggested that rather than being confined to a single chapter, historic environment considerations should be embedded throughout the plan, influencing decisions on growth, infrastructure, and sustainability. Further comments suggested that the proposed policy would not adequately balance development with heritage protection and enhancement. Several stakeholders recommend involving Historic England's Historic Places Panel to provide a wider strategic overview.
- 10.7 Some respondents criticised approaches taken to the Strategic Heritage Impact Assessment (SHIA) and individual Heritage Impact Assessment (HIA), which were viewed as lacking rigour, transparency, and coverage. Comments were received around how these assessments effectively assess the cumulative impacts of development, and how they properly evaluate Cambridge's heritage as a whole. Other respondents suggested there was an overreliance on visual distance rather than cultural significance, limited consideration of archaeological potential, and limited assessment of non-designated areas or approach roads into the city.

- 10.8 While a number of comments were generally supportive of the policy, some suggested it did not fully align with national policy and guidance, suggesting that new policies for issues such as Heritage at Risk, historic shopfronts, and the treatment of archaeology should be introduced to address gaps in the proposed policy approach.

### **New or updated evidence base**

10.9 Since the First Proposals consultation we have commissioned a series of more detailed site specific HIAs, undertaken using a methodology agreed with Historic England, to understand potential impacts of development on above and below ground heritage assets which have influenced final decisions on site allocations and supported the development of robust site-specific policy measures and requirements. These will ensure that any heritage impacts are managed and/or mitigated effectively. An additional Strategic HIA was also commissioned for Cambourne given the scale and extent of development proposed.

10.10 Additionally, part of the role of the Sustainability Appraisal is to consider the individual and cumulative impacts of development on a range of economic, social and environmental matters, including the historic environment.

### **Draft policy and reasons**

10.11 The draft policy can be viewed in the Draft Local Plan.

10.12 The historic environment of Greater Cambridge is both recognised nationally, but also internationally, underpinned by rich and diverse heritage that contributes significantly to the character of Greater Cambridge. Greater Cambridge includes a broad range of heritage assets, including locally distinct vernacular architecture, uniquely important archaeology and valuable arable, industrial and collegiate heritage.

10.13 Cambridge's variety of heritage assets, from the landmark King's College Chapel to vernacular cottages, medieval streets and open commons, underpins the experience of residents, visitors, businesses and educational institutions. South Cambridgeshire also hosts a distinct variety of historic assets, and the district's varied geology is reflected in traditional materials such as brick, tile, clunch and clay batt. Greater Cambridge's villages stand out in the landscape, with a variety of forms that respond to their locations such as at the edge of Fens.

10.14 The presence of numerous Grade I, II\* and II listed structures, conservation areas, and historic parks and gardens across Greater Cambridge highlights the area's exceptional heritage value. The proposed policy seeks to ensure that the significance of these designated assets is fully understood, respected, and conserved as through local planning and development decisions. The National Heritage List for England provides a full record of listed buildings and registered parks and gardens, while the [Greater Cambridge Shared Planning website](#) has a full list of Greater Cambridge's conservation areas (and Conservation Area Appraisals, where available).

### **Additional alternative approaches considered**

10.15 No additional alternative approaches identified.

### **Response to main issues raised in representations**

10.16 Policy GP/HA addresses concerns raised in representations around the design and impact of new development on designated heritage assets. By encouraging design that responds positively to the heritage context, new development will need to contribute to and enhance local distinctiveness, thereby ensuring growth complements rather than erodes the unique character of Greater Cambridge's historic urban and rural assets.

10.17 GP/HA also addresses concerns raised in representations regarding conservation areas, with clear and concise policy requirements, in regard to development that would affect the designated heritage asset, alongside buildings or structures that make a positive contribution to the wider conservation area.

10.18 In responses to the responses received, we have developed additional heritage policies to address the broad and diverse heritage of Greater Cambridge, including GP/HA which addresses designated heritage assets, GP/ND which addresses non-designated heritage assets with explicit reference to the Cambridgeshire Historic Environment Record, GP/AR which addresses archaeology and GP/SF which addresses shopfronts. Having individual policies for each element of the historic environment has enabled us to develop more specific and targeted approaches to different types of historic assets.

### **Further work and next Steps**

10.19 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## **11. Policy GP/ND Non-Designated Heritage Assets**

### **Issue the Plan is seeking to respond to**

- 11.1 This policy sets out the Local Planning Authority's approach to development that will have either direct or indirect effects on non-designated heritage assets. In relation to this, the Local Plan outlines how non-designated heritage assets across Greater Cambridge will be identified and where they can be viewed.

### **How the issue was covered in the First Proposals consultation**

- 11.2 Policy GP/ND is a new policy created following comments received during the First Proposals consultation in relation to Policy GP/HA. Representations highlighted that the proposed policy direction focused too strictly on designated heritage assets and requested that more was done to recognise non-designated heritage assets in planning policy, particularly those outside of Cambridge City as commenting parties felt that the policy was overly city centric.
- 11.3 Policy GP/ND seeks to provide requirements for the preservation and consideration of non-designated heritage assets. This approach to non-designated heritage assets adapts aspects of Policy 62 of the Cambridge Local Plan (2018) and Policy NH/14 of the adopted South Cambridgeshire Local Plan (2018).

### **Policy context update**

#### **National Planning Policy Framework (NPPF, December 2024)**

- 11.4 An amended version of the NPPF was published in December 2024. Chapter 16 of the NPPF (Paragraph 216) continues to highlight that, in determining planning applications that have either direct or indirect impacts on non-designated heritage assets, local planning authorities should apply a balanced judgement as to the scale of any harm that development may have on identified non-designated heritage assets.

## **Summary of issues arising from First Proposals representations**

- 11.5 The comments received during the First Proposals consultation reflected the strong support for the protection and enhancement of the historic environment of Greater Cambridge. Comments received emphasised the need for a broader and more inclusive approach to heritage, expanding beyond designated heritage assets and more explicitly including non-designated heritage assets as part of the decision-making process. This included the need for references to be made to local records such as Cambridgeshire's Historic Environment Record.

## **New or updated evidence base**

### **Cambridgeshire's Local Heritage List**

- 11.6 Cambridgeshire County Council, in collaboration with Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council, and South Cambridgeshire District Council, are working to prepare a list of locally important heritage assets – once on the list, these assets become known as non-designated heritage assets for the purposes of planning decision making. The List is managed by the Cambridgeshire Historic Environment Record on behalf of the County Council.

## **Draft policy and reasons**

- 11.7 The draft policy can be viewed in the Draft Local Plan.
- 11.8 Non-designated heritage assets can be buildings, monuments, sites, places, areas or landscapes identified by as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria to become a designated heritage asset.

## **Additional alternative approaches considered**

- 11.9 No policy and rely on national policy. This was not the preferred approach because national planning policy does not provide applicants with detail of local historic environment records of non-designated heritage assets in Greater

Cambridge, and consultee comments (including Historic England) requested that the Local Plan addressed non-designated heritage assets more explicitly.

## **Response to main issues raised in representations**

11.10 The Local Planning Authority acknowledge that planning policy should approach the historic environment holistically and consider aspects of the historic environment beyond designated heritage assets. The Local Planning Authority also appreciates that non-designated heritage assets can play a very important role in helping to define the historic character of Greater Cambridge and that some locally important heritage assets make major contributions to community identity and wellbeing. Therefore, Policy GP/ND seeks to introduce policy requirements that seek to preserve non-designated heritage assets and ensure that decisions are balanced when considering development that either directly or indirectly affects these assets.

11.11 The Local Planning Authority also acknowledge that non-designated heritage assets are considered differently to designated heritage assets, both in terms of national planning policy and in law. Policy GP/ND has sought to separate requirements for designated heritage assets from non-designated heritage assets to provide clarity to both applicants and decision makers. This includes reference to Cambridgeshire's Local Heritage List – the primary database of non-designated heritage assets in Cambridgeshire.

## **Further work and next steps**

11.12 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## 12. Policy GP/AR Archaeology

### Issue the Plan is seeking to respond to

- 12.1 This policy sets out the Council's approach to archaeology, including requirements for archaeological assessment, investigations, and recording.

### How the issue was covered in the First Proposals consultation

- 12.2 Policy GP/AR is a new policy created following comments received during the First Proposals consultation in relation to Policy GP/HA. Representations highlighted that the initial policy approach to archaeology was ambiguous and required further clarification. In recognising that the historic environment needs to be considered holistically, whilst also acknowledging that different rules and requirements can apply to historic buildings, conservation areas and sites of known and unknown archaeological potential, the Councils have prepared Policy GP/AR to clarify the approach to archaeology in local planning decision making.
- 12.3 Policy GP/AR seeks to protect sites of archaeological importance and provide requirements for the assessment of a site's archaeological potential, including how the finds and results of any archaeological investigations should be recorded with the [Cambridgeshire Historic Environment Record](#). This approach to archaeology in planning policy adapts aspects of Policies 61 and 62 of the Cambridge Local Plan (2018) and Policy NH/14 of the adopted South Cambridgeshire Local Plan (2018).

### Policy Context Update

#### National Planning Policy Framework (NPPF, December 2024)

- 12.4 An amended version of the NPPF was published in December 2024. Chapter 16 provides guidance on conserving and enhancing the historic environment, including in relation to archaeology.

## **Historic England Advice Note 17 – Planning and Archaeology**

12.5 In 2022, Historic England prepared an advice note that focuses on archaeology and its relationship with the planning system. This includes an overview of the legislative protections of scheduled monuments and other archaeological assets provided under the Planning & Compulsory Purchase Act 2004 and the Ancient Monuments and Archaeological Areas Act 1979.

12.6 Advice Note 17 also sets out the responsibilities of local planning authorities in assessing and addressing matters relating to archaeology as part of both plan making and decision making. In plan-making terms, recommendations are made that warrant the creation of a specific policy that sets out:

- How both designated and non-designated heritage assets, including assets of archaeological interest, will be managed through the local planning system;
- How archaeological remains and finds should be preserved in line with local historic recording practices and national planning guidance; and
- Requirements for archaeological investigations (a breakdown of appropriate archaeological investigation measures is provided within Advice Note 17).

## **Summary of issues arising from First Proposals representations**

12.7 Comments received emphasised the need for a clearer approach to archaeology within the Local Plan. This included the need for references to be made to local records such as Cambridgeshire's Historic Environment Record.

## **New or updated evidence base**

12.8 No new or updated evidence.

## **Draft policy and reasons**

12.9 The draft policy can be viewed in the Draft Local Plan.

12.10 Archaeology provides a unique insight into both local and national heritage and allows an insight into past cultures, conflicts and other human activities. Some archaeological sites are designated as scheduled monuments, although most

archaeological assets are non-designated and not identified until development proposals come forward. Scheduled Monuments, and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, are nationally significant assets and afforded great protection by national planning policy and the law.

- 12.11 The Councils recognise the value of sites of historic and archaeological interest, particularly in terms of their contribution to education, leisure and tourism, and the need to protect these assets from harm or loss caused by development. The [Cambridgeshire Historic Environment Record](#) – hosted by Cambridgeshire County Council – is the most comprehensive database of archaeological sites and finds in Cambridgeshire.

### **Additional alternative approaches considered**

- 12.12 No policy and rely on national policy. This was not the preferred approach given consultee requests that the Greater Cambridge Local Plan is clearer on the matters of archaeology in policy – the policy approach is intended as an application of national planning policy in a local context.

### **Response to main issues raised in representations**

- 12.13 The Councils appreciate that archaeology is a significant consideration for planning decisions and that the matter of archaeology can be very complex. Therefore, to clarify the Local Plan's archaeological requirements, taking account of the archaeological potential across the whole of the Greater Cambridge area, it was considered that the matter would be best addressed under a separate local planning policy, particularly when factoring the recent guidance published by Historic England.

### **Further work and next steps**

- 12.14 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## 13. Policy GP/CC: Adapting Heritage Assets to Climate Change

### Issue the Plan is seeking to respond to

- 13.1 Achievement of net zero carbon requires action to address carbon emissions from all aspects of the built environment, including the existing built environment. At the same time, it is important to ensure that any measures to enhance the environmental performance of heritage assets is balanced against the need to protect and enhance the character and value of that asset. This preferred option seeks to set an approach that allows for sensitive adaptations to heritage assets that will improve their performance while also protecting that asset.

### How the issue was covered in the First Proposals consultation

- 13.2 A policy approach was proposed in the First Proposals consultation. The Proposed approach and full representations received can be viewed here: [Policy GP/CC: Adapting heritage assets to climate change](#).
- 13.3 The First Proposals was supported by topic papers, which explored the context, evidence and potential alternatives and the preferred approach in greater detail: [Great Places Topic Paper First Proposals](#).

### Policy context update

- 13.4 [Historic England Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency](#) was published in 2024. The advice note contains advice and guidance relevant to changes to historic buildings and how they can be repaired, maintained and adapted to climate change.

### Summary of issues arising from First Proposals representations

- 13.5 Broad support for the policy was expressed within the representations from a range of individuals, public bodies, organisations and developers. Histon and Impington PC supported the policy on the condition that retrofitting improvements

don't harm heritage assets. Linton PC questioned the need for old buildings to adapt and argued that modern changes could harm the buildings. Comments included the need for clarity regarding what interventions are necessary to end heritage assets reliance on fossil fuels, that the policy should relate to all buildings of traditional construction and should relate to policy CC/NZ.

13.6 Cambridge Past, Present & Future stated that it would be useful to provide clear guidance on the appropriate location of solar panels on heritage assets and buildings within conservation areas. Gamlingay Parish Council stated that more support is needed to help residents with listed buildings retrofit temporary fittings to roof structures.

13.7 Historic England (HE) broadly support the policy but provided comments including that it should articulate the significant carbon output that is produced when demolishing old buildings and policies should recognise the benefits of sympathetic restoration and retrofitting historic buildings. HE noted that listed buildings, buildings in Conservation Areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of Building Regulations where compliance would unacceptably alter their character and appearance. HE noted that traditional buildings can be impacted by climate change to a greater degree than modern buildings and linked a number of publications to help guide the draft policy.

13.8 In terms of the additional survey questions, in relation to Q.4 (Cambridge North-East) and Q.13 (aspirational vision for Greater Cambridge) some respondents expressed a preference for retrofitting properties over creating new development.

13.9 Further detail, including where to view the full representation and who made each representation, is provided in the Consultation Statement.

### **New or Updated Evidence base**

13.10 No new or updated evidence.

## **Draft policy and reasons**

- 13.11 The draft policy can be viewed in the Draft Local Plan: [Link to the draft plan policy](#).
- 13.12 The draft policy aims to set out how to approach works to enhance the environmental performance of heritage assets and how that will be balanced against the need to protect and enhance the character and significance of that asset.
- 13.13 While high energy efficiency standards have been introduced for new buildings, we cannot meet our climate targets without reducing emissions and energy usage in all buildings. Improving energy efficiency is not only good for the climate, but it will also reduce running costs and can help to enhance the lifespan of buildings.
- 13.14 The Greater Cambridge Shared Planning Service is supportive of works to heritage assets to address climate change, as can be seen from case studies such as the Trinity College New Court project, which involved the deep retrofit of a Grade I Listed Building and other projects including the new air source heat pumps at Gonville and Caius College and water source heat pumps at Darwin College. Retrofitting heritage assets does, however, require a sensitive approach, which is why this preferred option has been developed, building on existing policies in our local plans.
- 13.15 Older buildings have fundamental differences in how they have been designed to perform compared to modern ones, so you cannot use the same approach as you would for a modern building. Traditional buildings are constructed from different materials and in different structural forms compared with modern buildings and consequently they perform differently. They usually heat up and cool down more slowly. Moreover they deal with moisture differently, allowing rain, groundwater and internal moisture (from washing, cooking and breathing) to move in a controlled way into and through their semi-permeable fabric. They also

rely on sunshine, wind, heating and adequate internal ventilation through windows, chimneys and draughts in order to keep dry. In good condition and with regular maintenance, the system stays in balance. Changes to fabric performance, heating and ventilation, if not correctly undertaken, can change this balance and lead to problems of overheating, moulds and ill health. So it's important to have a policy approach that requires an understanding of buildings – what is it made of and how do the fabric and services work together and what alterations may have already been carried out which may be causing more harm than good.

13.16 The preferred option advocates taking a whole building approach to heritage assets. This whole house approach is embedded within the Sustainable Traditional Building Alliances Retrofit Principles and their Retrofit Guidance Wheel. It recognises that there is no 'one size fits all approach' for traditional buildings and advocates that we start thinking about 'fabric, services, people and context' all in combination.

13.17 The Whole Buildings Approach is a way of thinking about retrofit in a manner that is holistic, and risk based:

- Consider the three areas of risk: energy, health, heritage;
- Take a whole building approach, accounting for: fabric, services, inhabitants' needs and behaviour, immediate context (weather, locality), and wider context (embodied carbon, decarbonisation of fuels), integrated for a building in balance;
- Use a joined-up process (linking assessment, design, construction, feedback).

### **Additional alternative approaches considered**

13.18 No additional alternative approaches identified.

### **Response to main issues raised in representations**

13.19 Representations calling for the policy to consider all buildings of traditional construction – policy in the local plan can only be applied for works that require

planning permission. Traditionally built properties that do not fall under the definition of a heritage asset may not require planning permission for certain works to enhance their environmental performance and would fall outside the lens of the policy. However, it is noted that guidance for these types of properties is still important, and indeed the guidance documents and whole buildings approach referenced in the policy will be applicable. As such, wording has been added to the supporting text to promote the use of this guidance for all traditionally built properties.

13.20 Representations calling for guidance on the placement of renewable energy technologies for listed buildings – Historic England already publish guidance.

### **Further work and next steps**

13.21 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.

## **14. Policy GP/SF: Shopfronts**

### **Issue the Plan is seeking to respond to**

- 14.1 Shop fronts play a key role in creating attractive and vibrant areas. Policy GP/SF seeks to protect existing shopfronts that make a significant contribution to the character of the area, taking into consideration the quality of design, historic importance and location. An attractive shopping environment contributes to the economic health and retail viability within Greater Cambridge. In all areas, the design of shopfronts and the appropriateness of signs must reflect local context, be sympathetically and sensitively designed, and enhance the wider street scape

### **How the issue was covered in the First Proposals consultation**

- 14.2 A standalone policy was not proposed in the First Proposals. However, when drafting policies, a further review was undertaken of the successful existing policies in the adopted Local Plans (2018). Shopfront guidance from the Cambridge City Local Plan was reviewed, updated and guidance has been carried forward in this draft policy.

### **Policy context update**

- 14.3 No policy context update.

### **Summary of issues arising from First Proposals representations**

- 14.4 A standalone policy was not proposed in the First Proposals.

### **New or updated evidence base**

- 14.5 No new or updated evidence.

### **Draft policy and reasons**

- 14.6 The draft policy can be viewed in the Draft Local Plan.

- 14.7 Shopfronts are often the most publicly visible and architecturally sensitive part of a commercial building. In many historic centres, towns and villages across Greater Cambridge, including within designated conservation areas and on Listed Buildings, shopfronts form an integral part of the street scape, contributing significantly to the area's historic character, sense of place and economic vitality.
- 14.8 The Local Planning Authority recognises that well designed and historically sensitive shopfronts enhance the appearance of an area and have positive impact on economic health and retail viability. Unsympathetic or poorly executed alterations – such as overly dominant signage, inappropriate materials or loss of original details- can cumulatively erode the distinctiveness of individual buildings and the overall coherence of townscape character.
- 14.9 New shopfronts should contribute towards the maintenance of a cohesive streetscape appearance. Contemporary shopfront design will be supported within appropriate locations. All new and altered shopfronts should be designed to be fully accessible to all.
- 14.10 Due to the nature of shopfronts being viewed as close quarters, the detailing, type and quality of the materials, and finishes are very important. In light of this, the policy approach seeks to secure the retention, repair, and sensitive reinstatement of historic shopfronts wherever they survive, and to ensure that new or altered shopfronts—whether within designated heritage assets or otherwise—respond positively to their architectural context. The local planning authority will seek to repair harm caused through past unsympathetic development whether previously authorised or not.
- 14.11 Greater Cambridge has a variety of building types and styles of varying ages. These include Georgian, Victorian, Edwardian and interwar shopfronts, many of which retain fine craftsmanship, traditional materials and historic details such as stall risers, pilasters, fascias and cornices. These features not only define individual building character but also reinforce wider streetscape coherence. The

loss or dilution of these components undermines local distinctiveness and heritage value.

14.12 The policy approach also reflects growing expectations around sustainability, with repair and retention of traditional elements being typically more sustainable than wholesale replacement.

14.13 High standard of shopfront design, which includes carefully balancing functionality with historical and architectural integrity, helps to enhance the pedestrian experience, support economic activity and foster civic pride. By adopting this approach to shop front retention and design, retail areas in Greater Cambridge will retain their distinct and unique character, whilst preserving heritage and visual quality.

### **Additional alternative approaches considered**

14.14 No policy and rely on national policy. This was not the preferred approach because national planning policy does not provide specific guidance in relation to shopfronts, and consultee comments requested that the Local Plan explicitly addressed the design of shopfronts.

### **Response to main issues raised in representations**

14.15 Through drafting of the local plan the Councils identified that a new standalone policy was needed to address this issue.

### **Further work and next steps**

14.16 Review the comments received on the draft Local Plan prior to preparing the proposed submission version, alongside any further evidence or changes to national or local policy.