

Consultation Statement

Appendix 10: Response to Representations - Wellbeing and social inclusion



Greater Cambridge Local Plan

Published as part of the Proposed Submission Local Plan - Regulation 19 consultation (August 2026 - September 2026)



GREATER CAMBRIDGE
SHARED PLANNING

Summaries of Draft Plan Representations, and Response to Main Issues Raised

Wellbeing and Social Inclusion

Wellbeing and Social Inclusion Introduction

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The importance of measures to address access to sport, to support good health, fostering community cohesion, community safety, and delivery of cultural infrastructure were raised in a range of general comments on this theme. It was identified that these issues apply to rural areas as well as urban areas. There was concern that some recent developments had not been supported by the right infrastructure to address these issues. The need for specific types of infrastructure, from skate parks to swimming pools were raised.

Some comments were concerned about developers not providing sufficient funding for new infrastructure, whilst some developers raised concern about the range of policies and their cost to implement. Comments made by ESCO Prospect raised concerns about

the policies being are too detailed and that the additional impact and costs to provide the information required will have on the viability and content of planning applications. A more considered approach should be taken to the amount of information sought for smaller schemes below 100 dwellings.

Comments made by Cambridgeshire County Council cited the need for new towns to safeguard land for high-quality municipal swimming pools and leisure centres to meet future demand and reduce car trips. Concerns were also raised about a number of social issues, many related to criminal activity. Other comments related to the provision of health care services, burial/cremation facilities, sustainable, well-designed places, green infrastructure and realistic alternatives to private car use to encourage walking, cycling, wheeling and use of public transport. No specific provision or uses for young people, either within sports and leisure or cultural hubs. Other comments noted the omission of supporting locally grown food, larger developments should provide affordable units for community food enterprises and design space for small walkable food retail. Essex County Council cited their keen interest to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities within and adjoining Essex.

Comments made by Cambridge Past Present and Future suggested whether this section should include policy and/or supporting information on Assets of Community Value. One member of the public requested clarification about how CIL/s106 funds will benefit the parishes affected by development, which should be addressed to ensure local communities gain from the expansion.

There was considerable support, with reference to S/PRIA/EG that the Elizabeth Way bridge and Underpass(es) become a cultural hub project and benefits this project would bring to the local community. Great Wilbraham PC highlighted how restrictive development prevents villages from benefiting from new residents joining the village community to offset rural decline. One member

of the public commented on the poor provision of amenities and services in Great Abington which are inadequate to serve what would eventually be a vastly increased population within easy reach.

Comments made by Cambridge Sustainable Food asked for larger developments to include space for small, walkable food retailers and affordable units for community food enterprises, so everyday food is readily available. Cambridgeshire Constabulary highlight the need for policies to address crime prevention measures. The British Horse Society highlighted the need for public rights of way and provision for equestrians. Comments made by CPRE Cambridgeshire and Peterborough cited the need for Policy SC/1 (Health and Wellbeing) to comply with the Equality Act 2010, the UN Convention on the Rights of Persons with Disabilities, and NPPF paragraph 8.

Comments made by Cam Skate raised the need for a permanent accessible, high-quality indoor skate space in the city and explained the benefit such a facility can bring to the community. Their current facility is a short-term meanwhile use with a lease expected to expire in July 2026. The update to the 2016 Indoor Sports Facility Strategy should include reference to the need for a 'restricted access skatepark' would be offering an invaluable social resource for young people in the Cambridgeshire area. Research shows that skateboarding is not simply a recreational hobby—it is a reliable and evidence-backed tool for youth development, public health, and community cohesion. Comments made by Sport England support the plan's overarching objective to protect, enhance and provide new sport opportunities, insisting that any loss of playing field be replaced with equivalent or better quantity, quality, accessibility and management.

Response to the main issues raised in representations

The Localism Act requires the Council to keep a 'List of Assets of Community Value' which will help to identify what facilities and services local communities consider to be valuable, however this is a separate process to the draft Local Plan which is informed by a series of evidence documents covering a range of uses including: indoor and outdoor sports; cultural and community facilities; retail; and leisure activities. These documents highlight how these facilities are important to local communities and have been used to inform draft local plan policies. The loss of any facility, important to the local community will normally be resisted.

A series of sports strategies have been developed to identify the need for future sports facilities including the retention of existing facilities to meet the needs of existing residents. These have also identified how new development should provide for a range of sports to support healthy lifestyles, including new swimming pools and sports halls. Any loss of a playing field would normally be resisted unless it could be re-provided in accordance with the policy's requirements.

Policy J/RC: Retail and other complementary town centre uses supports smaller food shops in smaller centres meeting day-to-day small-scale retail and service needs for local areas.

While all residential development is expected to contribute to infrastructure requirements, only larger developments of +200 dwellings are expected to submit more detailed assessments to inform infrastructure provision. Normally, off-site contributions will be spent on local infrastructure with the decision on what the money is spent on normally resides with the Parish Council in South Cambridgeshire or by Cambridge City Council.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. Policy GP/PP: People and place responsive design includes requirements for development to remove the threat or perceived threat of crime and improve community safety. Policy BG/EO: Providing and enhancing open spaces includes the provision for new development to provide food growing spaces.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Strongly supports a ban on vans with unhealthy food near the schools, especially the ice-cream van near Mayfield school with put parent under pressure to buy their children what is bad for them, and just before lunch - because their peers are getting some. Sugar is addictive and is known to cause multiple health problems, to be pushed so aggressively. Same for vans driving around playing loud music	201033 (E Mitenko)
It should be noted that there are no allocations identified in the draft GCLP for Hardwick that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including the aspiration for health services to be provided within the village, would be delivered in the absence of any related development.	204213 (Hill Residential Group Hardwick site)
Every person living with hydrocephalus & cerebral palsy in this city would disagree with the things you have highlighted as positives. This city is designed for cyclists, and no-one else.	201297 (M Bond)
I support Cambridge Junction and Create Cambridge in asking that:	202061 (H Chamberlain), 202136 (Cambridge

<ul style="list-style-type: none"> • The Cultural Infrastructure Strategy strengthens its focus on delivery pathways, not only mapping of need • Clearer links are made to planning obligations, capital funding routes and operating models • Partnership/shared-service capacity is resourced • Creative Commons approaches are included as part of long-term stability, not only meanwhile use • Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy 	<p>Junction), 202194 (H Tam), 202204 (H Tam), 202315 (Cambridge Junction), 202396 (J Webber), 202417 (T Shaw), 202431 (Kettle's Yard), 202690 (T Altmann), 202720 (W Townsend), 202789 (S Lee), 202880 (Cambridge Junction), 202886 (Cambridge Junction), 203038 (The Arts Theatre Cambridge), 203855 (N Yeni) 203876 (University of Cambridge), 205010 (Wysing Arts Centre), 205065 (University of Cambridge), 205120 (H Paterson), 205213 (J Walsh), 205326 (A C de Azevedo), 205359 (L Howse), 205362 (N Oakley),</p>
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205417 (Cambridge Junction), 205418 (A Sieglow), 201011 (H Chamberlain), 202761 (Cambridge Junction/Create Cambridge), 202762 (Cambridge Junction/Create Cambridge) , 204712 (A Giarlis), 202298 (Cambridge Junction), 202941 (R Terry), 202968 (T Flinders), 203635 (University of Cambridge), 203547 (D Lever), 203480 (L Heap), 203446 (S Ashworth), 203363 (N Ellis), 202466 (K Jones), 202329 (Cambridge Junction/ Create Cambridge), 204185 (Cambridge Junction/ Create Cambridge), 204697 (NEUBAU Architects)

<p>Suggest that security and crime prevention measures be embedded in planning policies to promote health, wellbeing and community cohesion, supporting the Wellbeing and Social Inclusion objectives.</p>	<p>201336 (Cambridgeshire Constabulary)</p>
<p>We support these policies and their commitments to wellbeing and social inclusion.</p>	<p>203026 (Cambridge City Council Liberal Democrat Group)</p>
<p>The British Horse Society supports the Plan's objectives for improving wellbeing and social inclusion. However, there is a lack of clarity between policies promoting "active travel" and those relating to the public rights of way network. Active travel is largely framed around walking and cycling, while rights of way are not consistently recognised as a distinct and valuable health and wellbeing asset in their own right. Public rights of way provide accessible opportunities for physical activity, social connection and contact with nature for a wide range of users, including equestrians.</p>	<p>203571 (British Horse Society), 203613 (British Horse Society),</p>
<p>The introductory overview to this theme is lacking in explicit recognition of class, disability, chronic illness and economic inactivity, risking exclusion of people who are not young professionals. We recommend amending the list of policy aims to include providing opportunities with no barrier to entry for leisure, sport, arts and socialising. We also recommend revising the introduction to emphasise the importance of community spaces and adding an aim to foster community across ages and backgrounds. This will help to ensure that development supports genuinely inclusive communities rather than simply an 'ideal' lifestyle for the individuals who live there.</p>	<p>203697 (Cambridge Green Party)</p>
<p>Permeability and access to shops, doctors, schools and leisure facilities within walking distance is critical to both the formation and continuity of community and the health of its members. People meet</p>	<p>205181 (D Stoughton)</p>

<p>each other at shared facilities or while walking to and from them are more inclined to form cohesive communities.</p>	
<p>Our focus is on walking/wheeling as the healthiest form of sustainable local travel, so our main concern is that new settlements and developments deliver this as a primary priority. If there are good local shops and control of unhealthy fast food retail outlets as you suggest then this is a major boost for people's health. They are more inclined to walk and meet others walking, helping to build a sense of community. We would be happy to organise walks in developments that are being constructed providing it is safe to do so - see our attachments in Great Places section.</p>	201631 (Cambridge Living Streets)
<p>You're trying to mix a huge range of very different people together which clearly doesn't work. Cambourne is already a disaster. Antisocial behaviour, council housing, famous for being on 24 hours in police custody. And yet you think it's a good idea to build more of this? And even closer to villages, which have listed buildings and people who have lived there for generations.</p>	201755 (K Smith)
<p>I agree what you say about supporting communities. But remember housing must be affordable for all. All communities need houses. It is not sufficient to say in general that housing should be appropriate. It is necessary to spell out that the low paid, often essential workers, need affordable housing. It is an obligation on us to ensure that affordable housing is always planned for.</p>	202174 (M MacGinley),
<p>The focus on healthy, inclusive communities is positive, but the policies appear geared mainly toward larger developments and urban style neighbourhoods. Rural health inequalities, isolation and access to services in smaller villages are not clearly addressed. Expectations around local facilities and sustainable travel may be harder to achieve in dispersed settlements without targeted support. There is little reference to community led provision or the role of village halls and outreach services. Stronger</p>	203173 (Cambridgeshire ACRE)

<p>rural proofing would recognise rural delivery models, support multipurpose community hubs and ensure transport and digital access underpin inclusion.</p>	
<p>Rural active travel routes and PROWs should be bridleway for social inclusion of females (mainly) who ride horses but also some men ride horses too.</p>	203979 (S Rogers)
<p>No recognition of or protection for local neighbourhoods who are going to disproportionately (in comparison to wider area) by developments, which will result in a decline in their quality of life and well-being.</p>	204923 (M Jordan)
<p>Support: Comment relating to a new cultural hub: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, a mix of uses will create employment opportunities for graduates, start-ups, makers and creatives seeking affordable workspace.</p> <ul style="list-style-type: none"> • creative hub helps to promote a sustainable, resource-efficient neighbourhood. • I support integration of young people with the arts and public realm • include youth outreach and education programmes, apprenticeships and learning opportunities, informed by council/ market research and needs/gaps. • provide commercial and self-organised recreation, open access sports provisions including urban skating, active landscaping a.o 	205310 (University of Cambridge), 204324 (Cambridge Junction/ Create Cambridge), 204214, 204219, 204232 (L Cooke), 204254 (A Giarlis)
<p>Wellbeing and social inclusion sounds great but planning requirements such as section 106's are just a 'must look at' they have no legal standing and there a developer can promise to provide at some time in the future. Can you learn from examples such as Northstowe and the large new developments in St Ives, no facilities, not even a shop. This policy fails to mention sport facilities.</p>	202823 (S Durman)

<p>We must give more consideration to places for people to die peacefully and with as much dignity as possible. You mention that the demographic will include more elderly people but you don't say enough about how their health and death will be supported. Much more consideration needs to be given to the provision of both.</p>	<p>202703 (S Berridge)</p>
<p>Great Wilbraham residents have a huge love for their village, its historic homes and buildings and, crucially, a shared knowledge of the families who have lived in them over the years. This is based on continuity of people and place over hundreds of years and enables rapid integration of newcomers. We believe this ethos exceeds anything in a new development and is very hard to replicate. It should be cherished in all the South Cambridgeshire villages. However, it requires some refreshment or people and planned, thoughtful small development in the villages, rather than simply preservation of the status quo.</p>	<p>203377 (Great Wilbraham PC)</p>
<p>No plans have been presented to increase doctor surgeries or NHS dentist capacity to match the new housing, putting extra pressure on existing health services. Do you have any plans to amend this and to do the same for further developments that are planned in other locations?</p>	<p>209170 (R Smith)</p>
<p>Great Wilbraham is an inclusive and caring community, in touch with a high proportion of its residents. However, our current facilities (School, Memorial Hall with social activities, Recreation Ground and sports facilities, public house, shop, quarterly magazine etc.) are jeopardised by a dwindling number of volunteers. Old people prefer to stay in the village, and with a policy of highly restricted development there is little refreshing of the population; our village community seems condemned to unmanaged decline. There are also poorer households in Great Wilbraham, but there is no indication through the strategy of how they will be assisted.</p>	<p>203378 (Great Wilbraham PC)</p>

<p>I know 15-minute neighbourhoods are politically toxic, but to meet active travel goals, there should be a requirement that no development will be permitted where reaching a food shop, doctor's surgery, school or community space requires the use of a car for the average adult in any of the houses in the development.</p>	<p>202633 (C Pointon)</p>
<p>Support this policy Point d regarding food growing should be strengthened to actively encourage integration of food bearing landscapes for urban foraging. This will become increasingly important with respect to future climate and food security impacts recently cited in the government paper: Nature security assessment on global biodiversity loss, ecosystem collapse and national security. This policy should also include opportunities for playable landscapes</p>	<p>204935 (Mothers CAN Cambridge)</p>
<p>In reviewing this chapter of the local plan, the policies stated are too detailed and provide significant overlap with national planning policies. The Plan does not recognise that the additional impact and costs which providing the information required will have on the viability and content of planning applications. Some of this information may be appropriate for a large application but for smaller schemes below 100 dwellings a more considered approach should be taken to the amount of information sought.</p>	<p>203212 (ESCO Prospect)</p>
<p>The Plan does not clarify how CIL/s106 funds will benefit the parishes affected by development, which should be addressed to ensure local communities gain from the expansion.</p>	<p>210455 (P Deer)</p>
<p>Support the plan's overarching objective to protect, enhance and provide new sport opportunities, insisting that any loss of playing field be replaced with equivalent or better quantity, quality, accessibility and management.</p>	<p>209214 (Sport England)</p>

Expect larger developments to provide affordable units for community food enterprises and design space for small walkable food retail, ensuring healthy food is not an afterthought	206965 (Y Dignon)
Welcomes the focus on the creation of “healthy, sustainable and inclusive communities”. ECC is keen to inform, shape, support and help refine development strategy and policies delivered by Local Planning Authorities within and adjoining Essex and would expect the Greater Cambridge councils to recognise ECC’s role as neighbouring infrastructure and service provider. This is of particular interest to ECC given the potential cross border impacts for ECC and involvement is necessary and beneficial and ECC’s statutory roles and responsibilities. Attention is drawn and an example of a relevant facility is at London Stansted Airport and the pioneering training campus - Stansted Airport College (STAC). The college opened in 2018 following an extensive partnership working with ECC, Harlow College and Manchester Airport Group (MAG).	210463 (Z Smith, Essex County Council)
Consider whether this section should include policy and/or supporting information on Assets of Community Value.	203999 (Cambridge Past Present and Future)
I commend Greater Cambridge for the Draft of the Local Plan which has excellent proposals and detailed intentions that are well communicated. However, in my opinion, there is a huge omission to the plan. That of the provision for attitudinal change towards affordable, sustainable, healthy, local food.	205079 (Y Dignon)
New towns must safeguard land for high-quality municipal swimming pools and leisure centres to meet future demand and reduce car trips.	207999 (Cambridgeshire County Council)
None or little reference of crime, antisocial behaviour, domestic violence, county lines (growing), faith, tourism, those seeking sanctuary, transport, resident voice, integrated neighbourhoods, parish council opportunities. What will the added pressures be to the health support available? Will there be enough	210534 (Cambridgeshire County Council)

<p>school places? enough activities for youth? extra curricular activities to allow parents to work, public toilets - accessibility and dignity? With health, one of the biggest themes is mental health, which links with outcomes for employment, citizenship, family etc.</p>	
<p>There is nothing that looks at specific provision or use for young people, which could be within either sports and leisure or within cultural hubs where perhaps a aim around supporting new and aspiring artists could be made there is very little in relation to youth or families.</p>	<p>210535 (Cambridgeshire County Council)</p>
<p>Public health welcome that health and wellbeing will be embedded throughout the plan e.g., that new development that creates sustainable, well-designed places which facilitate improving health, wellbeing and social interaction to reduce inequalities, promote inclusivity and support a sense of community will be prioritised. That there will be high quality new homes to meet the needs of all the community, including older people, those with care needs and younger people. That there will be investment in new or improved healthcare, public open spaces, community buildings, and active travel infrastructure making healthier lifestyles achievable. That there will be an extensive network of green infrastructure, green corridors and open spaces to increase the value of the environment for people and wildlife. That there will be realistic alternatives to private car use to encourage walking, cycling, wheeling and use of public transport.</p>	<p>210548 (Cambridgeshire County Council)</p>
<p>Expect larger developments to include space for small, walkable food retailers and affordable units for community food enterprises, so everyday food is readily available.</p>	<p>208195 (Cambridge Sustainable Food)</p>
<p>Our Sewage Plants can't take more bodily fluids as it is struggling currently. It's a major Health Hazard during predictable summer droughts when there's no 'flow' - just smell the drains in the Civic Quarter in July/August. Our streetscapes are dirty, water-less, unhygienic, ugly, bollarded and dangerously</p>	<p>208874 (R Lambert)</p>

<p>potholed - it's shameful, it's a 'con' inviting overseas Visitors to see and experience closed public 'conveniences', 'disappointing'.</p>	
<p>For wellbeing and Social Inclusion, interaction with Nature, Soils, Seasons, Countryside is vital; don't fill new Developments with Betting Shops - Screen-Free Community activities should be our aspiration to balance mental health in ongoing CRISES of Climate, Cost of Living directly caused by depressing geopolitics and deliberately-stoked Wars which make millions for some.</p>	208876 (R Lambert)
<p>Cam Skate raise the need for a permanent accessible, high-quality indoor skate space in the city. Cambridge is an active, growing city, which has hugely benefited from the recent addition of The Warehouse indoor skatepark which was first opened in September 2024 on Coldham's Lane. Indoor skateboard facilities are a critical part of social infrastructure. Our community of skatepark users spans children, teenagers, adults, women and girls, neurodivergent people, and beginners who rely on supportive, safe environments to participate safely and confidently year-round. The current lease is a short-term meanwhile use (at the time of writing lease period ends July 2026) and only made possible through the constructive and community supporting outlook from landowners.</p>	210560 (Cam Skate)
<p>We welcome the reference to skateboarding in the Wellbeing and Social Inclusion Topic Paper, but the table sets out a response that references open space policy which lacks a clear reference in regards to indoor skateboarding. Open space policy is not relevant to indoor skatepark provision and should instead be addressed through the Indoor Sports Facility Strategy. A 'restricted access skatepark' would be offering an invaluable social resource for young people in the Cambridgeshire area.</p>	210568 (Cam Skate)
<p>National and academic research demonstrates that skateboarding facilities improve wellbeing, reduce antisocial behaviour, and build stronger communities. This could be evidenced in topic papers:</p>	210569 (Cam Skate)

<p>- Written evidence submitted to the UK Parliament reports, - Research by Iain Borden shows that skateparks produce clear social, cultural, health, and economic benefits, including significant reductions in antisocial behaviour. - A recent academic study on girls and non-binary young people found that skateparks act as “communities of care”. - Research from the Highlands shows skateparks contribute positively to identity formation, wellbeing, resilience, and community connection, highlighting their importance for youth and community health. These findings show that skateboarding is not simply a recreational hobby—it is a reliable and evidence-backed tool for youth development, public health, and community cohesion.</p>	
<p>Cambridge’s success and identity has always been inseparable from its surrounding rural communities and landscape. If Greater Cambridge wishes to protect the city’s character, wellbeing and global reputation, it must also stand up for the rural communities beyond the Green Belt that help give it context, sustain and define it. As such, the Greater Cambridge Local Plan must recognise public access, tranquillity and landscape quality as critical health infrastructure, not optional extras.</p>	209121 (S Hepworth)
<p>Current amenities and services in Great Abington, for example school, Post Office/store, recreation ground, public house, Village Institute etc are inadequate to serve what would eventually be a vastly increased population within easy reach.</p>	207977 (G Brown)
<p>Policy SC/1 (Health and Wellbeing) must ensure compliance with the Equality Act 2010, the UN Convention on the Rights of Persons with Disabilities, and NPPF paragraph 8.</p>	211723 (CPRE Cambridgeshire and Peterborough)

Policy WS/HD: Creating healthy new developments

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was general support for the policy. The objections received included duplication with other policies, HIA thresholds, a belief that the policy is not supported by appropriate evidence or viability testing and the omission of equestrian activities, with the suggestion that policy should focus on high-level principles with topic-specific policies and site-specific assessments securing detailed requirements. A number of respondents supported the policy but with concerns regarding threshold levels, a desire to strengthen the policy, and requests for the inclusion of end of life services and facilities, Active Design, health hubs, the Public Rights of Way network, provision of sporting, play, recreational and mental health supporting green and blue spaces in policy wording. It was also requested that policy wording include and emphasize healthy, vibrant and connected communities, onsite and offsite infrastructure provision and increase emphasis on food security with provision of allotments and growing spaces, food hubs and markets in new neighbourhoods, people first communities anchored in active lifestyle provision and mental health and amenity for existing and new residents. Comments also requested further evidence on harm from gambling and betting, and the inclusion of restrictions on gambling premises in the policy. Some comments questioned the need for elements of the policy, and repetition with other parts of the plan.

Health impact assessments (HIA)

A number of comments included concerns regarding HIA threshold levels and the application of Healthy New Town Principles with more flexibility and proportionality requested. The inclusion of HIA requirements at validation rather than in policy was suggested. Others supported HIAs, considering them to be a useful tool for planning applicants and for the Local Planning Authority to make informed decisions for healthy and safe communities. Additionally, comments requested that HIAs include a requirement to food access and food environment assessment and that older people's housing be explicitly excluded from the HIA requirements and instead the policy should recognise the health benefits that delivering older people's housing can bring to individuals.

Hot food takeaways

Concerns included the need for a hot food takeaway policy and repetition with national policy. A lack of formal identification, definition in glossary or Use Class was raised and the omission of retail or food destination centres from the restrictions. Whilst others support further strengthening of policy wording to prevent community asset loss to hot food takeaways, greater management where outlets are near schools with, for example, opening time restrictions and further clarity needed on threshold distance from schools was requested as was a ban on advertising for High in Fat, Salt and Sugar foods. Public Health would like to be consulted on any planning applications for HFTs.

Active travel and lifestyles

Reference to active travel was welcomed but there were concerns that the policy should focus on wider forms of active travel, including equestrian activity, and provision to and from developments, and recognise that it is important for physical activity and social connection. A need for seating and toilets to facilitate active lifestyles for all and climate change mitigation measures such as water fountains were also raised. It was requested be more wide-ranging, not only referring to employment areas, that the policy include reference to public transport including requiring the inclusion of a good bus network at an affordable ticket cost and that it

recognise that non-motorised user routes to leisure spaces can contribute to healthier lifestyles. Comments noted that the PPS is currently only at Stage C and listed as key supporting evidence.

Other comments

Other concerns include that the policy duplicates principles already covered in other draft policies related to housing, biodiversity, and green spaces.

[Response to main issues raised in representations:](#)

Comments on the policy are noted.

The policy seeks to highlight the importance of place in the health and wellbeing of individuals and communities and to outline how Local Plan policies seek to help to create healthy places. It is recognised that clarity is required that the policies listed in part 1 are not standalone policies and amplify rather than duplicate policies elsewhere in the plan. As such, many of the issues raised, including in respect of active travel, are addressed in policies in other themes such as Great Places and Infrastructure. Evidence behind each element of the policy can be found in the Health and Wellbeing Topic Papers at each stage of the Plan as well as in the Consultation Statement. Including the policy requirements in an overarching policy prevents duplication and ensures consistency.

The Health Impact Assessment Supplementary Planning Document was consulted on in November 2024 to January 2025 and adopted in April 2025, this confirmed the thresholds for HIAs in Greater Cambridge. It is considered appropriate that the Plan requires their application across Greater Cambridge. The SPD HIA checklist includes a number of areas raised by respondents including Access to Healthy Food and older people as a protected group. The HIA process ensures that impacts on all groups are

considered in the HIA process including residents, workers and visitors. It is expected that the application of Healthy New Town Principles will be proportionate to the nature of the site.

Recognising the remit and the tools and resources available to the local planning authority, with respect to the policy element on hot food takeaways and fast food outlets, the policy seeks to implement national policy and manage harmful concentrations in retail areas, at the same time responding to concerns around food poverty and the provision of healthy alternatives. The need for clarity in the policy requirements is acknowledged and a number of changes seek to address the issues raised. The policy element preventing community asset loss to hot food takeaways has also been strengthened.

Representations requested that control of gambling premises be included in the policy. As set out in the Wellbeing and Social Inclusion Topic Paper, evidence indicates that the demographic make-up of Greater Cambridge is such that that the risk of problem gambling is high. A new policy requirement has therefore been introduced risking harmful concentrations.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	202090 (J Flynn, Great Shelford Village Charity), 202482 (M Parsons, University of Cambridge), 203028 (K Porrer,

	Cambridge City Council Liberal Democrat Group), 204571 (H Bennett, Max Fordham), 203142 (P Tribble), 203886 (T Burgoine), 204935 (H Tardrew, Mothers CAN Cambridge)
Object selected	204595 (Redrow South Midlands), 204847 (Hill), 203589 and 208658 (L Warth, British Horse Society)
The Policy is supported subject to the thresholds at which different complexities of statements is retained.	203215 (ESCO Prospect)
Support the policy which sets out how place and space have a significant impact on health and wellbeing.	202482 (M Parsons, University of Cambridge)
I would like to have more walking routes - for me and for my child, maybe something more interesting than ordinary sidewalks - with paintings on the pavement, or some stories on the side. Maybe some sand	201034 (E Mitenko)
A stronger policy is needed to ensure that new properties are designed to enhance mental health and amenity of existing and future residents, particularly in higher density locations.	201386 (Gamlingay PC)

<p>Broadly support but with the following caveats:</p> <ul style="list-style-type: none"> • It does not consider the growing demand for end-of-life care services and facilities (e.g. hospices) that will sit alongside an expanding population. Providing for more and better end-of-life care is critical to overall quality of life. Recent pushback on a proposed reduction in bed capacity at Arthur Rank Hospice is testament to local strength of feeling on this matter and is one illustration of the local impact of a lack of joined up planning between health and social care. • Clause 1c of the policy should be expanded to read, “Providing, protecting and enhancing accessibility to green and blue open spaces FOR SPORTING, RECREATIONAL AND MENTAL HEALTH PURPOSES (Biodiversity and Green Spaces).” The benefits of access to green and open spaces are noted in supporting para 6.8 but should also be explicit in the policy’s wording. 	<p>201615 (Stapleford PC), 208101 (N Webster, Great Shelford PC)</p>
<p>Recommend revising the stated aim of the policy to emphasize healthy and vibrant communities, not just individual healthy lifestyles. Point 1 should explicitly support compact, well-connected neighbourhoods to enhance sustainability and social interaction. Suggest:</p> <ul style="list-style-type: none"> • Adding a new clause 1.j to ensure that homes are integrated with accessible local employment and services where appropriate. • Amending point 2 to place a clearer responsibility on developers to contribute to health strategies and • Strengthening point 7 to protect essential community assets from being lost to hot food takeaways. 	<p>203699 (R Comins, Cambridge Green Party)</p>
<p>it is questionable whether the hot food takeaways section is required as there is clear and unambiguous advice provided in the current and draft NPPF. It is unnecessary repetition of national policy</p>	<p>203215 (ESCO Prospect)</p>
<p>Strongly welcomes management of hot food takeaways near schools. Greater neighbourhood exposure to takeaways is linked to poor diet and health. Research has also demonstrated that managing</p>	<p>203886 (T Burgoine)</p>

<p>takeaways near schools can reduce proliferation and achieve long-term positive population health impacts at no local economic cost. However:</p> <ul style="list-style-type: none"> • The council will need to defend their regulation of “fast-food” outlets, which lack formal definition. • Evidence shows that exempting designated centres from regulation will substantially diminish potential health benefits. Other (more) profitable retail uses do exist. • Clarity on whether 400m is from the school boundary or otherwise, would aid implementation. 	
<p>Part 6 of the policy refers to a concentration of hot food takeaways and fast food outlets. Fast food outlets are not defined in the glossary nor in the Use Classes Order. Applying this to a food retail destination may not be appropriate given the nature of the use and destination.</p>	204898 (A Brand, Abbey Properties Limited)
<p>The control of fast-food takeaways - this does not match recent planning of 'retail parks' which have primary been fast-food takeaways, the one in St Ives is a prime example.</p>	207435 (S Durman)
<p>Supports the principle of new developments promoting healthy lifestyles but Part 1 of Policy WS/HD duplicates principles already covered in other draft policies related to housing, biodiversity, and green spaces. It is suggested that Policy WS/HD should explicitly reference the relevant existing policies to avoid redundancy and unnecessary wording or it paragraph 1 should be deleted.</p>	204363 (Cambridge Investment Partnership), 204847 (Hill)
<p>Supports the requirement for Health Impact Assessments (HIAs) for major developments as stated in Part 2 but requests an increase in the threshold for full HIAs from 100 to 500 dwellings. A proposal is made for a rapid HIA for developments of 200-500 dwellings, while no HIA should be required for schemes of 200 or fewer dwellings.</p>	204363 (Cambridge Investment Partnership), 204847 (Hill)
<p>The requirement for a full Health Impact Assessment at 100+ dwellings further adds technical cost and complexity for a mid sized scheme, despite the Topic Paper not providing evidence that such</p>	204595 (Redrow South Midlands)

<p>developments generate impacts warranting this level of assessment. Without clearer thresholds, proportionality tests, or a mechanism to rationalise overlapping requirements from related policies (open space, GI, active travel, climate adaptation), WS/HD risks imposing unrealistic expectations on smaller residential sites. The policy should therefore be amended to provide size based flexibility, proportionate HIA requirements, and clear alignment with the Topic Paper's intent, ensuring that non strategic developments are not held to standards only deliverable in strategic growth locations.</p>	
<p>Supports a policy that supports healthy lives and the requirement for health impact assessments to focus on major developments with the potential for significant health impact. There is an established connection between planning and health and the planning system has an important role in creating healthy communities. The planning system is essential for improving health services and infrastructure to meet evolving healthcare needs and addressing wider determinants of health. Health impact assessments are considered to be a useful tool for planning applicants and the Local Planning Authority to make informed decisions for healthy and safe communities.</p>	<p>205125 (NHS Cambridgeshire and Peterborough Integrated Care Board)</p>
<p>Cambridge, like much of the UK, is heading towards a food security crisis. Local and organic food production needs greater emphasis in the Local Plan.</p>	<p>205658 (F Samuel)</p>
<p>Point d regarding food growing should be strengthened to actively encourage integration of food bearing landscapes for urban foraging. This will become increasingly important with respect to future climate and food security impacts recently cited in the government paper: Nature security assessment on global biodiversity loss, ecosystem collapse and national security.</p>	<p>204571 (H Bennett, Max Fordham), 204935 (H Tardrew, Mothers CAN Cambridge)</p>
<p>This policy should include opportunities for playable landscapes</p>	<p>204571 (H Bennett, Max Fordham)</p>

<p>Shisha lounges, including in restaurants, should be restricted. A clear policy would help enforcement on the unauthorised change of use to Sui Generis: shisha lounge.</p>	<p>201713 (K Mak)</p>
<p>Mentally healthy communities are connected communities, those where social interactions are possible, easy and part of everyday life. How traversal a community is a big part of this. Residents traveling door to door inside private motor vehicles do not have incidental opportunity to connect with their neighbours. A community where it is easy, safe and convenient to walk and cycle has these connections. This policy should include need for people first design within the development.</p>	<p>201823 (T McKeown)</p>
<p>The policy should: prioritise local recreation and wellbeing spaces within/adjacent to Girton; ensure health infrastructure is village-scale, not only district-scale as village-scale provision improves mental health, reduces loneliness, and encourages safe activity; and anchor healthy development criteria to Active Travel connections and accessible community facilities. Health outcomes depend on safe cycling/walking routes, the Pavilion upgrade, and green space protection.</p>	<p>202224 (Y Murray, Girton Parish)</p>
<p>Support the requirement for development to facilitate, encourage and to prioritise walking, wheeling and cycling and promote accessibility for all. Request that it go further and incorporate such provision for access to sustainable travel to and from the development, not just active travel within the development.</p>	<p>203142 (P Tribble)</p>
<p>Support the intent of Policy WS/HD, but objections to the policy include:</p> <ul style="list-style-type: none"> • The policy's (and plan's) focus on walking and cycling as the primary forms of active travel is overly narrow and risks excluding other legitimate users. It is inconsistent with national transport and health evidence, which recognises horse riding as a physically active mode of travel that delivers significant physical and mental health benefits. • Public rights of way, including bridleways, are established health and wellbeing assets and provide inclusive opportunities for physical activity and social connection. 	<p>203589 and 208658 (L Warth, British Horse Society)</p>

<ul style="list-style-type: none"> The majority of riders are women, often in age groups with traditionally lower rates of physical exercise, meaning improved equestrian access supports wider health equity. The omission of equestrian access creates an imbalance that is inconsistent with inclusive and equitable placemaking. <p>Request that the policy:</p> <ul style="list-style-type: none"> Explicitly include equestrian activity within the definition of active travel, unless there is an exceptional justified reason for exclusion. Recognise the contribution of equestrian access to physical activity, mental wellbeing, and social inclusion by improving accessibility for diverse demographic groups, including women and older adults. Apply design criteria that allow safe horse movement alongside other users. Signage and wayfinding must be clear for multiple user groups. 	
<p>Rural active travel routes and PROWs should be bridleway to include equestrians.</p>	<p>203980 (S Rogers)</p>
<p>Support the policy but would like evidence to be gathered around gambling and betting harm and restrictions on outlets to be added into the policy to avoid large concentrations in one area.</p>	<p>203028 (K Porrer, Cambridge City Council Liberal Democrat Group)</p>
<p>The Local Plan should recognise that a good bus network with affordable tickets is vital to make Greater Cambridge a place where everyone can thrive, including people who can't drive, disabled people and people with low disposable incomes. A good bus network ensures everyone can access education, employment, key services, large shops (cheaper supermarket as opposed to expensive village shop), social networks and sports/leisure activities. It is particularly important for young people. Bus travel is therefore a vital tool to boost health, wellbeing and social inclusion.</p>	<p>203107 (S Hughes)</p>

Support the objectives of the policy and the Council's proposed approach to creating healthy new developments. The site at Balsham Road, Linton will meet daily needs within walking distance to the services and facilities in Linton, encouraging active travel. This would reduce reliance on the private car, promote social interaction and contribute positively to both environmental quality and residents' physical and mental health. The proposed development would make a positive contribution to nature and deliver long-term health and wellbeing benefits for future residents.	204857 (S Boyd, Vistry Group)
Land north of Barton Road and at Grange Farm supports the aims of Policy WS/HD by including a local centre with potential healthcare services, extensive green space and recreation areas, and strong walking and cycling links to nearby sustainable transport routes	205185 (North Barton Road Landowners Group)
Supports policy WS/HD and recommends explicit reference to Active Design within it.	210846 (C Howe, Sport England)
Strong support for the direction of travel of the healthy place-making approach and the requirement for new development to provide access to healthy food through allotments and community growing spaces.	208185 (S Dyer, Cambridge Sustainable Food), 206955 (Y Dignon)
Welcome the policy intent to manage the local food environment, including controls on hot-food takeaways and fast-food outlets to protect children's health.	208186 (S Dyer, Cambridge Sustainable Food), 206956 (Y Dignon)
Recommend tightening delivery by requiring food access as part of Health Impact Assessments: Where HIAs are required, include a simple "food environment" assessment: walkable access to affordable healthy food; quality of the local food offer; and measures to avoid concentrating unhealthy uses. (This builds directly on the Plan's approach to health and takeaways.)	208191 (S Dyer, Cambridge Sustainable Food), 206961 (Y Dignon)

<p>The plan should require space for community food assets in new neighbourhoods to support delivery of community-scale assets that make healthy food practical and affordable: neighbourhood food hubs, community kitchens, food co-ops/social supermarkets, and periodic markets (especially in larger allocations and growth areas). This aligns with the Plan's stated intent to enable access to local services and support social enterprise.</p>	<p>208192 (S Dyer, Cambridge Sustainable Food), 206962 (Y Dignon)</p>
<p>Section 1e of this policy discusses how new developments should facilitate walking, wheeling and cycling and promote accessibility for all, but does not mention public transport. A new subsection should be added below 1e: Ensuring that developments provide easy access to bus stops, mobility hubs or railway stations for easy onward travel across the wider area.</p>	<p>203237 (R Wood, Cambridge area Bus Users)</p>
<p>To what extent is health provision considered in the Local Plan. Cambridge planning dept and Addenbrooke's are commissioning a joint study about how planning can help to deliver a new model of healthcare (hub model).</p>	<p>205784 (Rustat road Neighbourhood Association)</p>
<p>Propose following text addition to policy 1.a: The design of new developments should include appropriate and sufficient seating spaces in open spaces, play areas, and footpaths alongside the development as well as ensuring there are public toilet facilities spread across the development.</p>	<p>208053 (J Turner, Northstowe TC)</p>
<p>Propose following text addition to policy 1.g: The design of open spaces of new developments should encompass climate change mitigation measures at early phases of development where tree canopy has not yet developed sufficiently to provide shelter. Open spaces should include public drinking water fountains to facilitate healthy habits across the entire population, including those most at risk of being affected by dehydration in heat waves such as older and younger population.</p>	<p>208054 (J Turner, Northstowe TC)</p>

<p>Note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals. For the plan to be in line with national policy and effective the following wording should be added the policy to recognise the health benefits of older persons housing: "Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment".</p>	<p>208317 (Churchill Retirement Living with McCarthy and Stone)</p>
<p>This policy requires a Health Impact Assessment (HIA) to be prepared for development proposals for between 20 to 100 dwellings. This seems particularly onerous for smaller sites, and we suggest that a higher dwelling threshold, such as 50 dwellings and above would be more appropriate.</p>	<p>208357 (T Elbourn)</p>
<p>Object to Policy WS/HD because it is overly broad, prescriptive and insufficiently justified, placing significant and sometimes unrealistic burdens on developments of all scales. In its present form, the policy risks duplication with other parts of the Plan, lacks proportionality, and has not been supported by appropriate evidence or viability testing. The policy should focus on high-level principles that support healthy placemaking, while relying on topic-specific policies and site-specific assessments to secure detailed requirements. Proportionality must be embedded through clear thresholds and flexibility for non-strategic sites. The HIA requirements need to be revised to only apply to major strategic developments, with rapid assessments or no assessment required for smaller schemes. The policies expectations must be tested through whole-plan viability analysis before the next iteration of the Plan.</p>	<p>208991 (L Robinson, Barratt Homes Northampton)</p>

<p>Policy would benefit from greater flexibility in its application to reflect local circumstances. In particular, it is suggested that the policy more clearly recognises that health principles should be applied to new development 'wherever possible' and 'as appropriate', drawing on the ten principles of creating healthy places from the Healthy New Towns programme or any future equivalent. This would ensure the policy remains proportionate and adaptable across a range of site types and scales.</p>	<p>210245 (Vistry Group)</p>
<p>Policy lacks clarity regarding the requirement for Health Impact Assessments (HIA). Where the Councils intend to undertake a plan wide HIA, it is considered unnecessary for development proposals that accord with the Local Plan to be required to submit a separate HIA, as such proposals should already be addressing the health outcomes identified through the plan-making process. Requiring additional HIAs at the application stage in these circumstances risks unnecessary duplication. If the Councils consider that HIAs should be required for individual development proposals, Vistry and The Quay Estate suggest that this is more appropriately addressed through application validation requirements rather than embedded within policy.</p>	<p>210246 (Vistry Group)</p>
<p>Public Health are supportive of Policy WS/HD that HIAs should form an integral part of preparing a development proposal and undertaken early to inform the proposed design and layout. Topics that could form the HIA and that can affect the health and wellbeing of different groups within a community. PH acknowledge that an HIA needs to be proportionate to the development proposed.</p>	<p>210551 (C Fitzsimons, Cambridgeshire County Council)</p>
<p>Public health fully support the inclusion of 'Hot Food Takeaways'. However, public health is disappointed that it is implied that hot food takeaways will be supported in Greater Cambridge's designated centres irrespective of its distance from a primary or secondary school, further education college or youth centre, as there is evidence that promoting unhealthy eating habits, particularly high-</p>	<p>210552 (C Fitzsimons, Cambridgeshire County Council)</p>

<p>fat, high-sugar and high-salt diets contribute to childhood obesity and poor oral health. They can lead to increased consumption of fast food over healthier school meals and a rise in health inequalities. Public Health would like to be consulted on any planning applications for HFTs as we would like to see restrictions on opening hours to reduce the accessibility to school children at the end of the school day which could be achieved by the imposition of planning conditions.</p>	
<p>Public health recommends that Gambling is also included within this policy. Gambling presents significant public health issues, causing individual, family, and societal harm, including debt, mental health crises (anxiety, depression, suicide), relationship breakdown, substance misuse, and crime.</p>	<p>210553 (C Fitzsimons, Cambridgeshire County Council)</p>
<p>Public health recommends that advertising for High in Fat, Salt and Sugar (HFSS) is also included within this policy. This has been done by other councils. HFSS are a major public health issue because their excessive consumption drives obesity, type 2 diabetes, heart disease, and certain cancers, leading to increased mortality and burden on health systems; they are heavily marketed, especially to children, influencing poor diets, and their affordability/ promotions encourage overconsumption creating a cycle of poor health and growing non-communicable disease rates.</p>	<p>210554 (C Fitzsimons, Cambridgeshire County Council)</p>
<p>Paragraph 1.h. - Ensuring employment areas have the facilities for active travel (Jobs) - why is this for employment areas only? Suggest the following amendment: Ensure that developments are designed to encourage healthy lifestyles with high quality active travel routes which, for employment areas, connect to nearby population centres and for residential developments connect to key destinations.</p>	<p>210584 (C Fitzsimons, Cambridgeshire County Council)</p>

<p>The facilities to promote non-motorised access for all should seek to provide connectivity to the PROW network. To increase accessibility any existing barriers to access such as stiles or gates should be removed wherever possible.</p>	<p>210619 (C Fitzsimons, Cambridgeshire County Council)</p>
<p>Active travel facilities should be designed to link to networks beyond the development.</p>	<p>210620 (C Fitzsimons, Cambridgeshire County Council)</p>
<p>Support providing and enhancing accessibility to green and blue spaces, but the policy could recognise that non-motorised user routes to leisure spaces can contribute to healthier lifestyles.</p>	<p>210624 (C Fitzsimons, Cambridgeshire County Council)</p>
<p>The policy could support the establishment of PROW to enable and encourage users to connect to the wider PROW network, which can provide much greater opportunities for exercise than that available within one single development.</p>	<p>210625 (C Fitzsimons, Cambridgeshire County Council)</p>
<p>It is welcome that Policy WS/HD 1.e and Policy GP/PP 1.b.ii. contain important principles for active travel.</p>	<p>210633 (B Serin, Transport 2000 Cambs & West Suffolk)</p>
<p>The aspirations of Policy WS/HD are supported in principle in accordance with the provisions of Chapter 8 of the Framework. However, Part b of the draft Policy text requires new developments to deliver community and health facilities to meet the needs generated by the development. Whilst it is recognised that it is essential that development is supported by the requisite infrastructure, it is recommended that the policy text is amended to identify that this infrastructure could be secured through on-site provision or by financial contribution towards off-site provision. It is considered that the reference at Part f of the Policy towards ensuring that developments are designed to mitigate the impact climate change is</p>	<p>211286 (Woolsington One Ltd)</p>

<p>removed, given that the Draft Plan already contains extensive policies relating to climate change and the mitigation measures that are required of development.</p>	
<p>Support the principle of addressing health impacts through development. However, a threshold of 20 dwellings is unusually low and risks being disproportionate, particularly on small or medium sized sites where impacts can be addressed through standard planning tools and contributions. We recommend raising the threshold to align with national practice (for example 200 units) or alternatively apply HIAs only where a screening assessment identifies specific health impacts that require further work. A higher site threshold of circa 200 units is much more likely to make the policy sound. Where sites allocated for development are consistent with the policies in the local plan the council should be clear that an HIA is not required.</p>	<p>208970 (T Vincent, Persimmon Homes East Midlands)</p>

Policy WS/NC: Meeting the needs of new and growing Communities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Policy was broadly supported by both individuals and organisations including Anglian Water Services Ltd

Comments made by Stapleford PC broadly supported the policy, only that it omitted to mention palliative or hospice care. Great Shelford Village Charity cited their uncertainty about the applicability of the policy to their charitable almshouse association and suggests it could deter future expansion of almshouse units. Other individual comments made included: ensure infrastructure is provided with new housing; the need for community 'muster' points which a community recognises as a gathering point in emergencies.

Comments were made by many individuals and organisations recommending amendments to the policy: placing clearer responsibility on developments to fully mitigate impacts and maximise contributions to local facilities; requiring assessments to consider capacity, quality and accessibility alongside other planned developments, and to ensure infrastructure was delivered when it is needed.

Cambridge Investment Partnership (CIP) requested the merger of the policy's paragraphs 3 & 5 for clarification purposes. CIP should also suggested paragraph 5 be better aligned with other draft policies to ensure feasibility in meeting housing and infrastructure requirements.

Girton PC requested the Local Plan require school–parish shared-use agreements in new development proposals, support land identification for youth, sport, community space, and active recreation and embed localised service-provision expectations for Minor Rural Centres like Girton.

Comments made by Pioneer Group recommended the Council should follow the model as set out in emerging national decision-making policy HC3 to ensure ongoing consistency. Comments made by Redrow South Midlands and Railpen questioned the soundness of the policy requirements, imposing disproportionate and duplicative obligations on development. The requirement for developments of 200+ dwellings to conduct detailed community needs assessments is not supported by robust evidence or clear thresholds. The requirement for 129m² of indoor community space per 1,000 population lacks sufficient evidence and imposes a rigid quantitative standard that may not reflect local needs, it may also threaten the viability of development schemes. The policy's lack of clarity regarding on-site provision and its interaction with planning obligations and the Community Infrastructure Levy may lead to a cumulative financial burden on developers.

Comments made by the Homes Builders Federation also requested clarification for the assessments of community needs, these should focus on additional needs created by the development, rather than addressing existing shortfalls in the area. While Vistry Group supported the overall aspirations of the policy and suggested minor clarifications regarding the requirements in paragraph 4, specifically whether assessments of community needs should be included in existing documents or if they represent a separate requirement. They suggested the need for flexibility in the application of the requirement for on-site facilities, advocating for consideration of site-specific circumstances, viability, and the capacity of existing or planned off-site facilities; in certain situations, off-site provision or financial contributions may be a more effective and sustainable way to meet community needs, especially when

developments are well integrated with existing settlements. Bellway Strategic Land echoed these concerns. Woosington One Ltd considered the policy unnecessary as is duplicated other policies.

NHS Cambridgeshire and Peterborough Integrated Care Board suggested referencing the emerging Planning Obligations SPD in policy/supporting paragraphs to ensure consistency in securing developer contributions for health infrastructure.

Other comments included the need for a modern health centre in Cottenham, the policy made no allowance for farming, equestrians, country sports and heritage. Provision should be made for public transport and active travel access.

Comments were made by many individuals and organisations supporting Cambridge Junction's and Create Cambridge's request that: cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings; culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience); partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms.

[Response to main issues raised in representations:](#)

Policy WS/ND has been written in accordance with the current NPPF and informed by a number of studies including the Community Infrastructure Study and Cultural Infrastructure Strategy which will also inform the Infrastructure Delivery Plan to support the Local Plan. These studies recommend Community and Cultural Plans be developed, respectively to inform the type of infrastructure that should be provided and whether this should be on site or off site, or a combination of both. This will provide a flexible approach that takes into account local considerations and opportunities nearby to maximise investment in these facilities

and make the best use of development land. The policy has been amended to clarify how indoor and outdoor community and cultural facilities should be provided and secured.

The provision and location of healthcare facilities should aim to meet the need of existing and new residents, which may include the need for community-based, out-of-hospital facilities. The Local Planning Authorities have engaged with the relevant health organisations in developing the Infrastructure Delivery Plan that accompanies this Local Plan. Developers of large-scale sites and new communities will also need to engage with health providers to understand and respond to healthcare needs.

Policy WS/CH: Cultural and Creative Hubs, paragraph 2(l) includes a clause requiring new creative or cultural hubs to have a Management Strategy to ensure it will be viable in the long-term. This should outline, as a minimum, its long-term vision, objectives, market sector within the wider cultural or creative market, and financial resourcing. Where policy WS/NC: Meeting the needs of new and growing communities requires the provision of cultural infrastructure, Cultural Plans will need to be submitted as part of the planning submission process. These will need to demonstrate a robust, evidence-led and locally responsive approach to their provision and long-term viability. These plans will be secured through Section 106 agreements.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. On or off-site contributions towards improved leisure routes would include supporting Public Rights of Way or providing leisure routes.

Some comments challenge the approach to requiring assessments to accompany development proposals of over 200 dwellings or 5000sqm of employment. Whilst the Councils have explored needs through topic studies and the Infrastructure Delivery plan, it is important that community needs are explored at the site specific level when detailed schemes come forward, including engaging with local communities. This ensures delivery is based on the most up to date information. It will also be particularly important for windfall proposals.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Please learn from Northstowe! There is nothing except houses and temporary infrastructure. The community has had to organise food swap, community pantry and other local amenities for the residents. Infrastructure (school, healthcare, shops, pub) needs to be built at the same time as the houses. Bar Hill benefited from having all these things in place before the village was expanded	201040 (P Spowart)
The respondent expresses broad support for the policy but highlights the absence of consideration for the increasing demand for end-of-life care services, such as hospices, due to population growth in Greater Cambridge. The respondent emphasises the importance of providing adequate end-of-life care as essential for overall quality of life and believes it should be explicitly included in the draft Local Plan. The recent community pushback regarding proposed bed capacity reductions at Arthur Rank Hospice illustrates local concerns about the lack of integrated planning between health and social care. The respondent notes that while para 6.25 of the supporting text to Policy WS/NC lists necessary facilities for new communities, it fails to mention palliative or hospice care, despite including provisions	201616 (Stapleford PC)

<p>for burials. Para 6.33 discusses healthcare facilities but also omits any reference to end-of-life care, indicating a gap in the planning policy</p>	
<p>Anglian Water is supportive of the policy approach which enables onsite delivery of services and facilities in new communities. This provides flexibility and offers different options and pathways for delivering key infrastructure that may better align with the pace of development and viability - depending on the specific circumstances and challenges the new community might present. We agree that such provision should be determined in consultation with the service providers and, where necessary, relevant regulators.</p>	<p>210209 (Anglian Water Services Ltd)</p>
<p>The respondent expresses uncertainty about the applicability of the policy to their charitable almshouse association and suggests it could deter future expansion of almshouse units.</p> <p>The respondent highlights the lack of provisions for housing provided by charities in the draft Local Plan, arguing that almshouse charities should be treated differently from developers.</p> <p>The respondent notes that almshouse charities serve financially disadvantaged individuals of all ages, contributing significantly to affordable housing numbers.</p> <p>The respondent emphasises the importance of maintaining charity properties for those in need and asserts that these houses will not be subject to right to buy or otherwise cease to be available.</p> <p>The respondent argues that planning obligations or CIL contributions could misuse charitable funds, benefiting individuals not entitled to those funds. Debates and disputes about such obligations/contributions might require expert input and consequent unnecessary use of charity funds.</p> <p>The respondent requests that charities be exempt from the same demands placed on commercial developers.</p>	<p>202094 (Great Shelford Village Charity)</p>

<p>I support the weight being given to prioritizing the health and activity of communities and contribution to community centres where developments are large enough. I would like to suggest smaller housing developments, or existing street communities, include or identify 'muster' points which a community recognises as a gathering point in emergencies and would include a noticeboard for information, perhaps also a bench. This is a resilient back-up to Street WhatsApp groups and more inclusive, allowing the potential for face to face interaction</p>	<p>202367 (J Hobohm)</p>
<p>I support Create Cambridge in asking that:</p> <ul style="list-style-type: none"> • cultural infrastructure's ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms • This aligns community infrastructure with lived cultural use. 	<p>202394 (Kettle's Yard), 202681 (T Altmann), 202711 (W Townsend), 202776 (S Lee), 202860 (Cambridge Junction), 202922 (R Tarry), 202979 (T Flinders), 203012 (The Arts Theatre Cambridge), 203846 (Naz Yeni), 203864 University of Cambridge) 204906 (Wysing Arts Centre), 205106 (J Walsh), 204668, 204665 (NEUBAU Architecture), 202288 (Cambridge Junction), 202381 (J</p>

	Webber), 202393 (T Shaw), 202011 (H Chamberlain)
We recommend strengthening this policy by placing clearer responsibility on developments to fully mitigate impacts and maximise contributions to local facilities, to reduce the risk of cumulative strain from multiple schemes. We also recommend improving clarity and consistency in wording, requiring assessments to consider capacity, quality and accessibility alongside other planned developments, and correcting minor drafting errors. Finally, we call for clearer explanations of different facility types within the local plan itself, to improve transparency, accessibility and effective community infrastructure planning.	203700 (Cambridge Green Party), 205284 (N Oakley), 205306 (L Howse), 203620 (University of Cambridge, Z Svednsen), 204814 (L Matthews), 204154 (Cambridge Junction/Create Cambridge)
Policy WS/NC aims to ensure new development contributes to services and facilities for growing communities, including education, health, sports, libraries, and community uses. The made Fulbourn Neighbourhood Plan identifies aspirations for additional open space and health provision. Hill promotes Site Ref. 40271 in Fulbourn for housing and supports enhancing local facilities. The site could provide land for extending the recreation ground or allotments and make financial contributions if allocated. As no sites are allocated in Fulbourn, it is unclear how these needs will be met. Directing growth to sustainable villages such as Fulbourn would help deliver required services. No changes to the policy are requested.	203903 (Hill Residential, (Fulbourn site))
It should be noted that there are no additional allocations identified in the draft GCLP for Sawston that could make financial contributions or provide land for new or additional services and facilities.	203956 (Hill Residential (Sawston site))

<p>The respondent supports Policy WS/NC in principle but finds the wording regarding the delivery of on-site facilities vague, particularly the threshold for 'Developments of sufficient scale' which should be clearly defined. There is a request to merge Parts 3 and 5 of Policy WS/NC to avoid overlap and enhance conciseness. The requirement for on-site indoor community facilities under Part 5 is seen as restrictive against other policies, potentially impacting density uplift and housing numbers, as well as site viability for affordable housing and infrastructure delivery. The respondent requests that Part 5 of Policy WS/NC be better aligned with other draft GCLP policies to ensure feasibility in meeting housing and infrastructure requirements.</p>	<p>204371 (Cambridge Investment Partnership)</p>
<p>Objects, he principles of Policy WS/NC for delivering community facilities, emphasising their importance for community cohesion. The wording in paras 3 and 5 regarding on-site facility delivery is vague and requests a clear definition of 'Developments of sufficient scale' and a combination of overlapping requirements. Concerns are raised about the lack of clarity in para 4 regarding the geographic area for assessing cumulative impacts of smaller developments, suggesting that the requirement for such assessments be deleted. The respondent argues that the requirement for on-site indoor community facilities in para 5 may restrict housing density and site viability, impacting affordable housing delivery. There is a call for better alignment of para 5 with other draft GCLP policies to ensure deliverability of community facility provisions. The respondent stresses that smaller sites should not be obligated to provide facilities beyond their own demand and that requirements should not delay site delivery.</p>	<p>204865 (Hill)</p>

<p>Clarification is requested regarding the adoption and funding of the long-term operation of on-site community facilities. The respondent suggests including wording to allow for improvements to existing facilities in lieu of new on-site delivery when more efficient.</p>	
<p>To meet active travel goals, there should be a requirement that no development will be permitted where reaching a food shop, doctor's surgery, school or community space requires the use of a car for the average adult in any of the houses in the development.</p>	204750 (M Cleminson)
<p>Objects, the policy is deemed unsound due to insufficient justification from the Wellbeing and Social Inclusion Topic Paper (2025), imposing disproportionate and duplicative obligations on development.</p> <p>The requirement for developments of 200+ dwellings to conduct detailed community needs assessments is not supported by robust evidence or clear thresholds.</p> <p>The policy's 'one size fits all' approach contradicts the Topic Paper's recommendation for flexible, place-based strategies, risking unnecessary costs and delays. The presumption that larger sites must provide new on-site facilities does not align with the Topic Paper's view that enhancing existing facilities is often more effective. The requirement for 129m² of indoor community space per 1,000 population lacks sufficient evidence and imposes a rigid quantitative standard that may not reflect local needs.</p> <p>The cumulative impacts of the policy have not been viability tested, raising concerns given the existing obligations on development in the emerging Plan. The policy fails to meet the tests of being justified, effective, and deliverable, and should be revised to ensure flexibility and comprehensive viability testing</p>	204589 (Redrow South Midlands)
<p>Vistry supports the overall aspirations of the policy but suggests minor clarifications regarding the requirements in paragraph 4, specifically whether assessments of community needs should be included</p>	204861 (Vistry Group)

<p>in existing documents or if they represent a separate requirement. Vistry suggest the need for flexibility in the application of the requirement for on-site facilities, advocating for consideration of site-specific circumstances, viability, and the capacity of existing or planned off-site facilities. Vistry believes that in certain situations, off-site provision or financial contributions may be a more effective and sustainable way to meet community needs, especially when developments are well integrated with existing settlements.</p>	
<p>Other than Part 4 the policy appears to apply to all new development as opposed to just major housing developments. This should be refined.</p>	<p>204903 (Abbey Properties Cambridgeshire Limited)</p>
<p>Draft Policy WS/NC outlines requirements for new facilities, mandating on-site delivery for larger developments unless off-site benefits are proven.</p> <p>The respondent supports the need for consultation with service providers to ensure appropriate facility provision. The inclusion of a section for healthcare facilities is welcomed, emphasising the need to meet local health service requirements. Flexibility for healthcare providers in determining mitigation is advocated, with encouragement for ongoing engagement with relevant health bodies at the earliest stages and throughout the planning process. The respondent suggests referencing the emerging Planning Obligations SPD in policy/supporting paragraphs to ensure consistency in securing developer contributions for health infrastructure</p>	<p>205133 (NHS Cambridgeshire and Peterborough Integrated Care Board)</p>
<p>The North Barton Road Landowners Group—including University of Cambridge, Corpus Christi College, Cambridge, Downing College, Cambridge, Jesus College, Cambridge, and St John’s College, Cambridge—has promoted land north of Barton Road and at Grange Farm for a landscape-led urban</p>	<p>205190 (North Barton Road Landowners Group)</p>

<p>extension known as South West Cambridge. Draft GCLP Policy WS/NC seeks to ensure development delivers services and facilities such as education, health, community, and sports provision. The promoted development would provide a primary school, community centre, health services, local centre, and outdoor sports facilities to serve new and existing communities. No changes to the policy are requested.</p>	
<p>The healthcare needs of growing communities, such as Cottenham, must be addressed as local primary healthcare provision is insufficient due to increased population from speculative development. Existing GP practices are overwhelmed, leading to difficulties in obtaining appointments, which causes frustration for patients and may result in them giving up on seeking care. There is a need for a modern health centre in Cottenham that is fit for purpose to adequately serve the community's healthcare requirements. Failure to improve healthcare facilities may lead to increased demand on all levels of health services due to neglected healthcare needs.</p>	205270 (E Wilson)
<p>Objects, the council's definition of the area for assessing the impact of smaller developments is unclear, and the practicality of requiring the first development to assess impacts before others is questioned. It is recommended that the requirement for smaller groups of sites to assess community needs be removed due to impracticality and potential conflicts with planning obligations outlined in paragraph 58 of the NPPF. The policy should clarify that assessments of community needs should focus on additional needs created by the development, rather than addressing existing shortfalls in the area. The current wording suggests a broader assessment of community needs, which may lead to the requirement of infrastructure not directly related to the development, necessitating clearer policy language.</p>	205319 (Homes Builders Federation)

<p>I support Cambridge Junction and Create Cambridge in asking that:</p> <ul style="list-style-type: none"> • Cultural infrastructure’s ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms. This aligns community infrastructure with lived cultural use 	<p>205334 (A Sieglow), 205367, 202749, 202806 (Cambridge Junction/Create Cambridge, 205273 (AC de Azevedo Lamha), 205022 (University of Cambridge), 205035 (H Paterson), 204688 (A Giarlis), 203502 (D Lever), 203491 (L Heap), 203426 (S Ashworth), 203321 (N Ellis), 202456 (K Jones),</p>
<p>NIE strongly support Cambridge Junction and Create Cambridge in asking that:</p> <ul style="list-style-type: none"> • cultural infrastructure’s ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms, <p>This aligns community infrastructure with lived cultural use.</p>	<p>204379 (New International Encounter)</p>
<p>National planning policy requires that development plans, not planning applications identify shortfalls in the availability of community facilities and infrastructure. Reforms to the NPPF include a proposed requirement for developments which significantly increase local populations to provide for community</p>	<p>207445 (Pioneer Group Ltd)</p>

<p>facilities and improvements to public service infrastructure – either by delivery or financial contribution. The Council should follow the model as set out in emerging national decision-making policy HC3 to ensure ongoing consistency.</p>	
<p>Objects, wishing to fund the NHS (including Social Care) and Defence from increased growth rather than increased per capita taxation is understandable (whether we think it unrealistic or not) and it is equally expedient to disperse the responsibility for that growth across local authorities. However, largely because of climate change, central government investment and policy in this time-frame will move north and to higher ground. This is not to say that Cambridge and Cambridgeshire shouldn't grow and have a comprehensive development plan, but it needs to be understood in this context and would be more sensible laid out in a much more modular way.</p>	207343 (K Rhodes)
<p>Rural Active Travel routes and PROWs should be bridleway to include horseriders.</p>	203983 (S Rogers)
<p>As a largely rural and farming county, this policy makes no allowance for the following: Farming; Equestrians; Country sports; Heritage.</p> <p>As has already been established in many of the recent developments Section 106 Agreements has no legal standing and are to be treated as a 'will do at some time in the future'. We need to ensure we can feed ourselves.</p>	202828 (S Durman)
<p>Provision should be made for public transport and active travel access to enable easy access from surrounding communities and settlements to help sustain the facilities and amenities in new and growing settlements. Provision should be made to absorb further growth. Provision should be made to cluster facilities around public spaces close to public transport hubs.</p>	204703 (A Carpen)

<p>Girton's needs revolve around youth provision, shared-use facilities, and accessible recreation land, reflecting its existing and emerging community profile. Parish councils spend up to 85% of budgets on youth/sport — signalling real need. Shared-use agreements with Girton Glebe and local schools will unlock vital space. Growth without matching community infrastructure risks further strain on limited local assets.</p> <p>GPC Requests to the Local Plan: Require school-parish shared-use agreements in new development proposals. Support land identification for youth, sport, community space, and active recreation. Embed localised service-provision expectations for Minor Rural Centres like Girton.</p>	202225 (Girton PC)
<p>It should be noted that there are no allocations identified in draft GCLP for Fulbourn that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including open space and health facilities identified in the made Fulbourn Neighbourhood Plan, would be delivered in the absence of any related development.</p>	201957 (KG Moss Will Trust & Moss Family)
<p>Objects to Policy WS/NC, specifically part 4, stating that detailed assessments of community needs for residential sites of 200 or more dwellings should be the responsibility of the Councils, not developers. In relation to part 5, the respondent questions the clarity of the study informing the standard of 129 m2 of floorspace per 1,000 additional population for indoor community facilities, noting a lack of corresponding study for Cambridge city. The respondent highlights that the supporting text in paragraph 6.31 mentions ongoing preparation of further evidence by the Councils to assess community facility needs, suggesting that the current standard for indoor community facilities is not adequately justified.</p>	203089 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
<p>Object to Policy WS/NC, particularly Point 4, which requires detailed assessments of community needs for residential developments of 200 or more dwellings. They argue that these assessments should be</p>	204510 (Bellway Strategic Land)

<p>the Council's responsibility, not the developers.</p> <p>The respondent references Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, stating that obligations must be necessary, directly related, and fairly related to the development.</p> <p>They assert that new developments should not be responsible for addressing existing community needs and that the policy's ambiguous wording creates uncertainty and potential additional burdens on developers.</p> <p>The respondent recommends that if the Council pursues this policy, it must clarify that developments are only required to address needs that align with the CIL Regulations tests.</p>	
<p>Minor clarification is required in relation to the requirements set out in paragraph 4 of the policy. In particular, the policy states that proposals for residential developments of “200 or more dwellings (or groups of smaller sites which cumulatively exceed this figure)” must be informed by detailed assessments of community needs and include strategies demonstrating engagement with local communities and stakeholders. It is unclear whether this requirement is intended to be addressed through existing submission documents, such as a Statement of Community Involvement or Statement of Community Engagement, or whether it represents an additional and separate requirement.</p> <p>Clarification on this point would assist in ensuring the policy is applied consistently and proportionately.</p>	210247 (Vistry Group)
<p>Support the principle of ensuring that larger developments respond to community needs, however, the wording in limb 4, could be construed to place the onus on the applicant to assess community needs and produce a strategy to meet them. The policy would be more effective and proportionate if it required that major applications demonstrate how they have engaged with the LPA and relevant providers to meet identified needs, rather than placing the responsibility on applicants to determine those needs.</p>	208971(Persimmon Homes East Midlands)

<p>Suggested amendment to read: “For developments of 200 dwellings or more, applicants should engage with the Council and relevant service providers at pre-application stage to ensure that proposals address identified community needs and contribute to any site-wide strategy”</p>	
<p>Object. Policy WS/NC requires large residential and employment developments to conduct community needs assessments and engage local stakeholders, but lacks clarity on the specifics of these requirements, creating uncertainty for developers. The respondent argues that the burden of community needs assessments should be on the Council, not developers, to ensure clarity and consistency in planning. The proposed requirement for indoor community facilities may threaten the viability of development schemes due to its inflexible application of a fixed floorspace standard of 129m² per 1,000 additional population. The policy's lack of clarity regarding on-site provision and its interaction with planning obligations and the Community Infrastructure Levy may lead to a cumulative financial burden on developers. The respondent highlights that the policy conflicts with the National Planning Policy Framework and Planning Practice Guidance by imposing potentially onerous and duplicative requirements that could undermine the deliverability of the Local Plan. Changes to plan: Railpen therefore requests that the policy parts are removed.</p>	<p>204158 (Railpen)</p>
<p>There needs to be awareness that not all health and emergency services can be provided locally due to capital and revenue cost implications. The NHS 10-Year Plan aims to provide more health service in communities and this will require a strategic change for health facilities and where services are provided from outside of the acute setting. This may be in a community hub or existing health care facility.</p>	<p>210344 (East of England Ambulance Service NHS Trust)</p>
<p>Developers are expected to provide community facilities alongside housing, but past performance has been poor, necessitating rigorous oversight from local authorities.</p>	<p>210453 (P Deer)</p>

<p>It should be noted that there are no allocations identified in draft GCLP for Great Shelford that could make financial contributions or provide land for new or additional services and facilities. It is not clear how additional services and facilities, including those identified in the made Stapleford and Great Shelford Neighbourhood Plan, would be delivered in the absence of any related development.</p>	<p>201977 (Shelford Investments)</p>
<p>Support this policy but note that the timely delivery of services and facilities in early phases (para 6) is critical to new developments and must be resourced and enforced. We are currently lacking means to enforce delayed infrastructure which has knock on effects for our new communities so the LPA and the local plan needs to be clearer about penalties that could be applied for delays in bringing key facilities forward.</p>	<p>203034 (Cambridge City Council Liberal Democrat Group)</p>
<p>Object to the wording of Policy WS/NC, stating it is primarily focused on residential growth and not suitable for large-scale commercial development. The requirement for employment developments over 5,000 sqm to undergo detailed community needs assessments and stakeholder engagement is disproportionate and not justified by national policy. Policy lacks clarity on the expected services and facilities from commercial development, leading to uncertainty and viability risks. Commercial developments already contribute appropriately through CIL and Section 106 obligations, where impacts are clearly evidenced. The policy should differentiate between residential and commercial development, ensuring that requirements for community facilities and engagement are proportionate and evidence-based.</p>	<p>204441 (Tritax Big Box Developments)</p>
<p>The policies do not identify any demographic groups (including young people, older people, vulnerable adults, families, or disabled residents) and age-specific needs that should be catered for; this is particularly important in new developments for young people.</p>	<p>208052 (Northstowe TC)</p>

<p>Policy states that “developments of sufficient scale to generate the need for new on-site facilities will be required to do so, unless it can be demonstrated that there would be advantages in off-site delivery”.</p> <p>While Vistry and The Quay Estate support the principle of providing appropriate community infrastructure, it is important that this requirement is applied flexibly and takes full account of site-specific circumstances, including viability considerations and the capacity of existing or planned off-site facilities. In some cases, off-site provision or financial contributions may represent a more effective and sustainable means of meeting community needs, particularly where developments are well integrated with existing settlements.</p>	210248 (Vistry Group)
<p>Object to policy WS/NC as currently drafted. The policy is ambiguously worded, creating uncertainty that may impose an additional and unwarranted burden on development.</p> <p>Specifically, point 4 states that proposals for residential developments of 200 or more dwellings (or multiple smaller sites that cumulatively exceed this threshold), as well as employment developments over 5,000 m², must be informed by detailed assessments of community needs and include strategies to address those needs. It is understood that these assessments should be prepared by the Council as part of their Infrastructure Delivery Plan, and the responsibility should not fall on developers to determine which community needs a development should meet.</p>	204378 (Brookgate Land Ltd and Network Rail Infrastructure)
<p>Objects to Policy WS/NC, particularly point 4, which requires residential developments of 200 or more dwellings to be informed by community needs assessments prepared by the Council. The respondent argues that it should not be the responsibility of developers to determine community needs that a development should meet. The respondent references Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, highlighting the necessary tests for obligations related to planning</p>	204277 (Bellway Strategic Land)

<p>permissions. The respondent contends that new developments should not be responsible for addressing existing community needs and that the policy is ambiguously worded, potentially imposing an undue burden on developers. The respondent requests clarity from the Council that developments only need to address matters that meet the CIL Regulations tests.</p>	
<p>Large developments should have discounted council tax as they are paying for services that others get free.</p>	210497 (Cllr C Hofman)
<p>Our assessment of the proposed allocations confirms that early years and school needs can be met through a combination of existing facilities and the new provision planned for each of the major developments. There is little reference to children SEND, with what there is focused mostly on housing being able to accommodate people with disabilities. There is a need for more SEND provision across the area through a mixture of more provision in mainstream schools and additional places in special schools. Similarly, there is limited reference to early years provision beyond what is planned within new developments. Demand is expected to rise due to the extension of free childcare eligibility to children from nine months of age. Meeting this need will require a combination of expansions at schools and by voluntary and private sector providers.</p>	210528 (Cambridgeshire County Council)
<p>The traveller policy mentions - be located where the needs of the residents can be met without placing undue pressure on existing local services and facilities. I could not see this reference as explicit as this in any other area e.g. a new housing estate is often built without thorough reference to this. We are consistently looking at career paths and opportunities for young people, the volume of work within this plan could provide opportunities within this area. Whether there was any opportunity within this to focus</p>	210539 (Cambridgeshire County Council)

<p>on a local workforce percentage or a commitment to apprenticeship, training opportunities for local young people as part of this whole process</p>	
<p>Paragraph 6.25 - There is no reference to special needs provision. Paragraph 6.32 - There is no reference to special needs provision. The inclusion of the reference to discourage the use of restrictive covenants that would restrict the ability to use homes for childminding business use is supported.</p>	210592 (Cambridgeshire County Council)
<p>The land south of the A428 (Kingsfields) demonstrates clear potential to accommodate residential development that aligns with the Plan's spatial strategy and Policy WS/NC. The scale of the land allows for the coordinated and timely delivery of homes, education provision, community facilities and green infrastructure, supporting inclusive, healthy and sustainable communities and enabling infrastructure to be planned holistically.</p>	210618 (Church Commissioners for England)
<p>We are broadly supportive of this policy, with the following caveat: nowhere in the policy or its supporting text is consideration given to the growing demand for end-of-life care services and facilities (e.g. hospices) that will sit alongside an expanding population. Arthur Rank Hospice is testament to local strength of feeling on this matter and is one illustration of the local impact of a lack of joined up planning between health and social care. Para 6.25 of the supporting text lists examples of the facilities and services which could be required to meet the needs of new and growing communities; provision for burials is included in the list but nothing relating to palliative/hospice care provision; para 6.33 is explicitly about healthcare facilities but, again, does not mention end-of-life care.</p>	210941 (Great Shelford PC)
<p>Policy WS/NC of the Draft Plan identifies the requirement for new developments to include or contribute to the delivery of services and facilities necessary to meet the needs of the development. Whilst this is</p>	211287 (Woolsington One Ltd)

<p>supported, it is considered that Policy WS/NC represents an unnecessary duplication of Policy WS/HD which already incorporated the requirement for developments to address the infrastructure requirements they generate. As such, it is recommended that the requirements of these policies is consolidated into a single policy, to ensure that each of the policies contained within the Draft Plan serves a clear purpose as required by Paragraph 16 of the Framework.</p>	
<p>While the Draft Plan refers to schools and health facilities, it does not provide clarity on: When facilities will be delivered; Whether they will be accessible to existing village residents as well as new residents; How needs will be met for early years, special educational needs, adult social care, and older people. This creates uncertainty for residents and risks services lagging behind population growth. Include policy wording to ensure that healthcare and education services and facilities are delivered prior to or alongside housing occupation, with clear triggers and monitoring. Include a clear delivery and monitoring framework for Waterbeach Parish, identifying responsible bodies, funding mechanisms, and review points to ensure timely implementation.</p>	208978 (J Williams)
<p>It is recognised that services and facilities necessary to meet the needs of the development are a key element of a successful community.</p>	211542 (Martin Grant Land Limited)

Policy WS/CF: Community, sports and leisure facilities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was supported by The Theatres Trust.

Concerns were raised by Sport England about the reliance on dated evidence sports strategies. They have requested an up-to-date indoor and outdoor sports facility strategy be issued. Comments made by Cam Skate referenced the re-provision of an indoor skatepark facility within the Cambridge urban area. No reference to skateboarding or skateparks were made in the 2016 Indoor Sports Facility Strategy, the revised strategy update should include reference to the need for an indoor skatepark as a distinct facility type. A permanent year-round indoor facility in Cambridge would create continuity, safety, and inclusive access that outdoor spaces alone cannot deliver. Further comments included how the venue could be managed by the local community and the benefits such a facility would bring to the wider community.

Other individual comments made included the policy not referencing Public Rights of Way, not having sufficient ambition to deliver a stadium, rowing lake and 50m swimming pool. Sports facilities should take precedence over transport schemes.

One member of the public commented on the lack of high-end sports facilities that can be used for playing high level sports matches. Any plans to increase the residential population in Cambridge should consider providing a suitable space for national

league volleyball, basketball, handball, korfbal etc, rather than just more of the same inadequate facilities. Cambridge needs an opera house and a new large lifelong learning college for the purposes of skills; tackling loneliness; tackling poor health and increasing the range of options for residents. An outdoor cycle race track, a BMX track and further cycling, 'town' athletics track and high impact sports should also be provided. Every major settlement should have a public venue / performing arts space. It is important that sports facilities can be accessed using sustainable and affordable forms of transport. There was a lack of accessible swimming facilities in Great Shelford with a request for a local pool that does not require driving. Great Shelford PC noted their Leisure facilities were limited. The co-location of related public services and at Easter Gate (Policy reference S/PRIA/EG) the Elizabeth Way bridge and Underpass(es) should be considered for indoor and outdoor sports uses. Another member of the public requested that the policy include play. Play areas are an important part of diverse, healthy and sustainable communities.

Cambridgeshire County Council commented on the difficulty of replacing services in multi-functional community centres and flexibility is needed to avoid imposing requirements that mandate replication of a traditional, standalone library model. Public Rights of Way are an existing leisure and cultural asset which can be maximised and the policy could do more to recognise and promote these. It also noted South Cambridgeshire has no public leisure centres and relies heavily on village college sports facilities and on Cambridge City to meet demand and new towns include high-quality municipal swimming pools. While operation through secondary schools may be acceptable initially, this approach is unlikely to be sufficient as towns grow.

Histon and Impington PC cited they were under resourced in terms of sports and recreation facilities. Local opportunities exist to expand these. New facilities should provide both subscription sports and ad hoc play at no charge. Girton PC requested the Local Plan to allocate land for youth, sport, community wellbeing facilities in/near the village, require shared access to school facilities and prioritise village-scale investment.

Comments from Pioneer Group objected to the policy approach as it was in conflict with emerging national planning policy. National decision-making policy HC6 which provides a simplified policy that should be applied. One member of the public commented that the policy's paragraph 2(c) lacked a requirement for public transportation (as in 2018CLP Policy 73). Comments by the Cambridge Green Party requested a number of amendments to the policy. Comments made by NHS Cambridgeshire and Peterborough Integrated Care Board supports the provision of quality community facilities but were concerned paragraph 5 may hinder NHS's ability to deliver essential services.

Comments made by Cambridgeshire Local Access Forum objected to the policy approach not being more explicit about protecting, enhancing and integrating public rights of way and access networks across Greater Cambridge. One member of the public cited the need for improved footpaths which the Local Plan omits while the Cambridge Group of the Ramblers commented on the policy omitting reference to the evidenced benefits of leisure walking for both physical and mental health wellbeing; the main infrastructure required for enjoyable, leisure walking is the public rights of way network. Another member of the public requested rural active travel routes and Public Rights of Way be bridleways so they can include horse riders. The East of England Ambulance Service NHS Trust requested community facilities and infrastructure include all emergency services (ambulance, fire and police) and be supported by s106/CIL monies to mitigate population growth and to improve emergency health equipment.

North Herts Council referenced need for sporting facilities arising from Royston.

Response to main issues raised in representations:

The Councils are updating both the GC Playing Pitch Strategy and Indoor Sports Facility Strategy to support the emerging Local Plan. These follow Sport England's methodology and cover a range of outdoor playing facilities (football, rugby, cricket and hockey) and indoor sports facilities (swimming pools and sports halls). A separate Outdoor Courts & Rinks Strategy is also being prepared to cover many outdoor sports not covered by the Playing Pitch Strategy including bowling rinks, outdoor tennis courts and smaller Multi-Use Games Areas. Together, these form the evidence base informing WS/CF: Community, sports, and leisure facilities. The strategies will endeavour to reference additional sports needs beyond those required by Sport England, however without specific funding / delivery mechanisms in place for these additional sports, expectations about their implementation will need to be reflected in their funding prioritisation. Funding gathered by applicable developments will normally be directed to implementing the core sports needs identified in the respective strategies.

Policy WS/CF has been written in accordance with the current NPPF which requires policies to positively plan for the provision of a range of publicly accessible facilities. The policy takes account of proposals for new or replacement community, sports or leisure facilities, including city-wide or sub-regional facilities. Paragraph 1(a) refers to local need and not demand because of the difference in their meaning. Need relates to a deficit in provision while demand is a market driven concept based on preference and ability to pay. The policy is focused on providing for publicly accessible facilities. The inclusion of demand would broaden out the policy to include facilities already provided elsewhere in the area (including beyond Greater Cambridge) and as such may have the unintended consequence of undermining existing provision and lead to its displacement. This would include commercially or privately managed facilities that are also accessible to the local community. Paragraph 1(e) will ensure consideration is given to providing co-located facilities with other, complementary services and uses. Paragraph 1(f) has been worded to allow for new

facilities to provide multi-functional spaces that are open to the wider community. However, there may be circumstances where it is not suitable or appropriate to require proposals to provide these or provide access to the wider community.

In terms of protecting community, sports or leisure facilities, the policy's supporting text explains how the loss of a facility will need to demonstrate, both quantitatively and qualitatively, that the facilities are surplus to requirements and that the proposal will not cause significant negative impacts on the vitality of other local facilities (such as through demand pressures created by displaced users of the lost facility). In most cases, this will require a marketing exercise for a sustained period of at least 12 months to demonstrate a lack of demand; exceptions to this requirement include the loss of healthcare uses as the ongoing need for these facilities will need to be determined with the relevant Health Authorities.

Public rights of way are footpaths, bridleways and byways which have public access. They are protected by law and are maintained by the local highway authority (Cambridgeshire County Council). To support accessible community, sports and leisure facilities, Policy WS/CF paragraph 2(c) requires proposals for new, or replacement city-wide or sub-regional community, sports or leisure facilities to be provided in a sustainable location that supports sustainable travel. Sustainable travel is covered by policy I/ST: Sustainable transport and connectivity which would be applicable for new community, sports and leisure uses. The policy sets out how the transport impacts of development should be managed, and how new development should be located, designed and connected to the transport network to enable travel by sustainable modes. Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside. On or off-site contributions towards improved leisure routes would include supporting Public Rights of Way or providing leisure routes.

Officers have held discussion with North Herts Council and prepared a statement of common ground.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>This policy does not mention Public Rights of Way. PRow are open to all, free at point of entry, 24/7/365 therefore offer excellent value for money. There are many gaps in the existing network of byways, bridleways and footpaths on the definitive map; these missing gaps in the network must be filled asap due to the ever-increasing busy and dangerous roads. Especially for bridleways, these are used mostly by women and children who are the main riders of horses and often feel excluded where footpaths and cycleways are created.</p>	<p>201719 (S Jeggo)</p>
<p>Support this policy: The protection it affords the valued facilities in line with paragraph 98 of the NPPF (2024)</p>	<p>202018 (The Theatres Trust)</p>
<p>The draft plan for new community, sports and leisure facilities is disappointing and reactive rather than proactive. The Cambridgeshire Councils focus mainly on criteria to assess third-party proposals, offering little vision or leadership to deliver new facilities themselves. Apart from opposing hot food outlets near schools, there is no clear strategy. Ambitious projects proposed in 2005, including a stadium, rowing lake and 50m pool, have largely failed to materialise, with only the ice rink completed. Funding remains absent for others. It is suggested that taxpayers money should be used to prioritise sports facilities over transport schemes and believes residents would support this approach.</p>	<p>202453 (S Biggin)</p>

<p>It's vital these can be accessed easily and affordably by bus (otherwise many people won't be able to use them, especially young people). This policy should ensure this comes about.</p>	<p>203113 (S Hughes)</p>
<p>In particular, the requirement in 2.c to support sustainable travel minimises climate impact and enables access for everyone.</p>	<p>203148 (P Tribble)</p>
<p>Please state clearly that Cambridge needs a new large lifelong learning college for the purposes of: Skills; Tackling loneliness; Tackling poor health; Increasing the range of options for residents.</p>	<p>203795 (A Carpen)</p>
<p>The former county adviser for music, Ludovic Stewart, who taught at the Cambs holiday orchestra for decades, had a dream for a new opera house for Cambridge.</p> <p>The parents of the late Dame Olivia Newton John (born in Cambridge) met at the guildhall in Cambridge where her father Brinley, later Headmaster of what is now Hills Road Sixth Form College, was singing as a baritone. Let's get that opera house built for their legacies. It must be in an accessible location i.e. not NW Cambridge. The opera house must be a first class work of art.</p>	<p>203796 (A Carpen)</p>
<p>Every major settlement should have at their heart a public venue / performing arts space that isn't simply a bland minimal cost 'multi-use' hall that Clay Farm has.</p> <p>Make provision for a general template of a main public transport interchange spilling out onto a civic square with a performing arts venue on the opposite sides, and facilities for whatever the local residents of the settlements choose should be on the other remaining sides / in the vicinity. It can be scaled up/down according to size of settlement population.</p>	<p>203799 (A Carpen)</p>
<p>The GCSP needs to commission a survey and study to find out what attractions, facilities and amenities there are in other towns and cities that could be built in Cambridge or the surrounding new towns. The public and in particular children, teenagers, and people with lived experience of living in other cities and</p>	<p>203800 (A Carpen)</p>

<p>countries should be engaged with. Then survey the public to see what they want, and encourage groups to champion whatever choice they would like - especially where we don't have local provision. Eg an indoor roller rink (where 100 years ago Cambridge had three).</p>	
<p>Consideration should be made for the facilities mentioned in the abandoned Cambridge United Trumpington facilities application of the early 2010s which included an outdoor cycle race track, a BMX track and further cycling and high impact sports. See https://www.cambridgeunited.com/news/2013/november/plan-b-unveiled---grosvenor</p>	204732 (A Carpen)
<p>support point 2a-d- catchment area and wider community - with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, I support community facilities that help to meet the day-to-day needs of local residents. With reference to the above community project, I support a range of affordable facilities to be made accessible to local graduates and creatives, as well as target demographic groups (pupils, youth, students etc)</p>	204791 (M Cleminson), 204713 (T Woodcock), 204362 (NEUBAU Architecture Ltd), 205211 (Cambridge Junction/Create Cambridge), 204254 (A Giarlis)
<p>The respondent highlights the lack of accessible swimming facilities in Great Shelford, expressing a desire for a local pool that does not require driving.</p> <p>The nearest public swimming option is Sawston Village College Sports Centre, which has limited availability and requires pre-booking.</p> <p>The pool at the Strawberry Fields development in Stapleford has a capped membership of 100 external members, which is currently full. Residents from recent Trumpington developments share similar issues regarding access to swimming facilities. The respondent suggests that the under-used pool at the Frank</p>	204911 (A Sykes)

<p>Lee Centre on the Cambridge Biomedical Campus could be repurposed as a more widely available leisure centre.</p>	
<p>We again consider there to be conflict with emerging national planning policy. National decision-making policy HC6 provides a simplified policy which should be applied.</p>	207446 (Pioneer Group)
<p>Provision should be made for sites that incorporate green space for outdoor purposes whether as private property or spilling out onto public green space</p>	207457 (A Carpen)
<p>Provision for allied public services (GPs, dentists, creches, health clinics, public libraries, performing arts facilities) to be co-located should also be made. Create awe-inspiring places where people would choose to go and be</p>	207458 (A Carpen)
<p>Histon and Impington are under resourced with regards to sports and recreation facilities. Areas such as Site ID: 115407 has the opportunity to provide these facilities. There is also additional land not owned by Histon and Impington Parish Council near to the current recreation ground which has the potential to increase facilities. New facilities should be not only for subscription sports but should also be available for ad hoc play at no charge.</p>	201440 (Histon & Impington PC)
<p>Walking as a leisure activity might be expected to be covered by Chapter 6, Wellbeing and social inclusion. Policy: WS/CF: Community, .. places great emphasis on the need for sports facilities, but makes no reference to the benefits of walking the countryside for exercise or for wellbeing. The implication is clear: to exercise you should go to the gym.</p> <p>The front cover of the plan is very encouraging showing images of cyclists, wheelchair user, buggy user, dog walker and runners. And all of these activities need footpaths and open spaces. However, the Plan pays virtually no attention to improving footpaths.</p>	201636 (P Cutmore)

<p>My concern is the exclusion of walking in the countryside as a recreational activity in Chapter 6, Wellbeing and social inclusion. Policy WS/CF makes no reference to the evidenced benefits of walking for both physical and mental health wellbeing. And the main infrastructure required for enjoyable, leisure walking is the public rights of way network. The network is mainly soft surface, close to and amongst green infrastructure - but has shortcomings, because it is fragmented and there are some significant areas of housing which are cut off from access to public rights of way.</p>	<p>201792 (Cambridge Group of the Ramblers)</p>
<p>I would like explicit inclusion of play within this policy. Play areas are an important part of diverse, healthy and sustainable communities. However, it is an area often neglected as children and young people are not completing consultations.</p>	<p>201825 (T McKeown)</p>
<p>Sporting and leisure are required for all age groups, all abilities, indoors and outdoors.</p>	<p>202176 (M MacGinley)</p>
<p>Cambridge has a distinct lack of high end sports facilities that can be used for playing high level sports matches. Cambridge has several high performing sports teams competing at a national level who currently do not have easy access to suitable facilities with adequate playing area, home and away changing rooms, spectator space, and safe sprung sports floors (as opposed to concrete/tile). Any plans to increase the residential population in Cambridge should consider providing a suitable space for national league volleyball, basketball, handball, korfbal etc, rather than just more of the same inadequate facilities.</p>	<p>202010 (R Noka)</p>
<p>Rural active travel routes and PROWs should be bridleway to include horseriders</p>	<p>203986 (S Rogers)</p>
<p>1.a should be amended to read: "there is a local need or demand for the facility [...]", as there may be, e.g., no health need for a football pitch if there are already tennis courts, but there may well be high demand for both.</p>	<p>203703 (Cambridge Green Party)</p>

<p>In 1.f, “where appropriate” should be amended to “where possible.” This makes clear that developments including spaces open to the wider community are to be prioritised in planning. It also brings 1.f in line with the same “where possible” language in 2.d.</p>	
<p>Cambridge does not have a 'town' athletics track despite calls for one since the end of WW2. Could one be incorporated as part of a wider sports complex? (I wrote more in 2021 at https://cambridgetownowl.com/2021/09/14/how-do-we-secure-the-future-of-public-sport-and-leisure-services/)</p>	203824 (A Carpen)
<p>Girton’s identity and wellbeing depend on local sport and leisure, especially the Pavilion, recreation ground, and youth activity spaces. Key Points: Strong public support for Pavilion upgrades, youth sport, and accessible recreation. Active Travel enhances access to facilities and reduces parking stress. Shared school use is essential to meet rising demand. GPC Requests to the Local Plan: Allocate land for youth, sport, community wellbeing facilities in/near the village. Require shared access to school facilities. Prioritise village-scale investment, not only large district centres.</p>	202226 (Girton PC)
<p>Community facilities and infrastructure need to include all emergency services (ambulance, fire and police) and s106/CIL made available to mitigate population growth.</p>	210329 (East of England Ambulance Service NHS Trust)
<p>Given the national push toward early intervention and the ambulance sector’s expanding role in community public health, defibrillator installation is a critical feature. EEAST would request: • S106 funding for community AEDs, including: AED device; Heated, outdoor-rated cabinet; 10-year consumables and maintenance; Placement near power sources and high-footfall areas; An AED every 800 metres (best-practice community resuscitation standard).</p>	210330 (East of England Ambulance Service NHS Trust)

<p>We are concerned the Council's 2016 Playing Pitch and Indoor Sport Strategies are a decade old and do not meet NPPF 103; assessments should be refreshed at least every five years and PPS updated every three years, and we request an up-to-date indoor and outdoor sports facility strategy before publication. A clear understanding of current and future community sports facility needs, including playing fields, is essential for informing and justifying a local plan policy such as Policies BG/EO and BG/PO which covers the protection, enhancement and provision of sports facilities. To address these concerns, it is requested that the Council issue an up-to-date indoor and outdoor sports facility strategy.</p>	<p>209232 (Sports England)</p>
<p>CLAF objects to Policy WS/CF: Community, sports and leisure facilities.</p>	<p>208171 (Cambridgeshire Local Access Forum)</p>
<p>S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, the project sits in catchment area of 5 adjacent wards, connected by a shared infrastructure link, the Elizabeth Way bridge and related underpasses. The area sits within a public realm improvement area with potential to adapt leftover indoors and outdoors spaces for cultural and sports programmes, which would work well in line with the Cambridge tradition of skating and urban skating, providing indoors and outdoors recreation and youth engagement.</p>	<p>202037 (Skateboard Cambridge CIC)</p>
<p>1a "local need" strongly support; 1b "appropriate" strongly support; a "complement" strongly support; 2b "not have a negative impact" very strongly support; 2c lack of requirement for public transportation (as in 2018CLP Policy 73); 4 support; 5 support. Note that this proposed Policy would be thoroughly breached by the current (controversial and extremely badly received) Planning Applications to redevelop the essential central Cambridge Market Square... effectively changing it into an outdoor</p>	<p>202519 (J Neal)</p>

<p>cafe/entertainment space catering for tourists and students instead of continuing to provide a circular-economy-rich food-, service- and employment-hub for local residents, craftspeople and farmers.</p>	
<p>Community, sports and leisure facilities only benefit those who can travel to them easily and affordably. This policy should prioritise access to those facilities by walking, cycling and public transport. This will both reduce the negative impacts of increased car traffic and ensure they can be used by all.</p>	<p>203328 (Cambridge Area Bus Users)</p>
<p>The respondent supports the provision of quality community facilities but finds the proposed policy approach ineffective, particularly regarding Point 5, which may hinder NHS's ability to deliver essential services. Flexibility in the use of NHS estate is crucial for delivering patient care and funding improvements, and the requirement for exploring alternative community uses for NHS disposals causes delays in reinvestment. NHS land disposals must maintain or enhance local healthcare services, with decisions made by local health commissioners and NHS England, ensuring that properties are only disposed of when they are surplus. The respondent argues that if health facilities are surplus or part of NHS reorganisation, policies should support alternative uses without requiring excessive information or marketing.</p> <p>The proposed modification to Draft Policy WS/CF adds new wording to facilitate that the loss of healthcare facilities if formally declared surplus to NHS operational requirements or identified as surplus in an estates strategy.</p>	<p>205160 (NHS Cambridgeshire and Peterborough Integrated Care Board)</p>
<p>We are looking to co-locate and work the Libraries harder, making the library flexible enough to host the library offer, targeted support (children's centres), community centres (well established in the City with Clay farm, Cherry Hinton and East Barnwell) and could do more under cultural hubs, NHS delivery etc.</p>	<p>210531 (Cambridgeshire County Council)</p>

<p>The application of building class to ensure facilities within a development is noted. However, experience indicates that this approach can be restrictive when delivering a modern, flexible community building or library. Such facilities often accommodate diverse activities, including hosting community banks, providing arts and creative spaces, supporting live sports events, offering room hire, and enabling NHS service delivery. In some cases, protracted negotiations with landlords have been required to permit these activities due to class restrictions. Flexibility is essential when replacing services to avoid imposing requirements that mandate replication of a traditional, standalone library model.</p>	<p>210532 (Cambridgeshire County Council)</p>
<p>Policy does not recognise the health and wellbeing benefits offered by the PROW network. This network enables people to make a connection with the natural environment, providing an opportunity to enhance mental wellbeing, and enables users to exercise at the same time as travelling to a destination. They offer clean, traffic free journey opportunities. PROW are an existing leisure and cultural asset which can be maximised and the policy could do more to recognise and promote this.</p>	<p>210623 (Cambridgeshire County Council)</p>
<p>It is essential that new towns include high-quality municipal swimming pools. While operation through secondary schools may be acceptable initially, this approach is unlikely to be sufficient as towns grow. Even if funding through Section 106 or CIL is not prioritised, land should still be safeguarded for future provision. Swimming pools are vital community assets: they support children, young people and older residents, help build a strong sporting culture, and can significantly reduce car dependency when provided locally. A lack of local pools is a major driver of car travel.</p>	<p>211001(Cambridgeshire County Council)</p>
<p>Leisure centres are critical for public health and for fostering a culture of sport and physical activity. South Cambridgeshire is the only district without its own leisure centres, relying heavily on village college sports facilities and on Cambridge City to meet demand. Purpose-built leisure centres offer</p>	<p>211002 (Cambridgeshire County Council)</p>

<p>higher-quality facilities and a wider range of activities. The current shortfall undermines participation in sport, increases car journeys, and leaves some residents unable to access facilities at all.</p>	
<p>The Protection of Existing Facilities is particularly relevant to our current site and a new location within central Cambridge must be identified to avoid losing an invaluable community sports facility and social resource for young people. Due consideration should be given for the reprovision of an indoor skatepark facility within the Cambridge Urban Area.</p>	210566 (Camskate)
<p>In the 2016 Indoor Sports Facility Strategy there is no reference to skateboarding or a skatepark. "Informal spaces" is not sufficient as a reference and does not accurately capture the proven demand for an indoor skatepark facility. In line with the document's recommendations, when the strategy is next reviewed (this is due for a review now), an indoor skatepark should be included as a distinct facility type within the strategy.</p>	210567 (Camskate)
<p>Without long term security of a permanent indoor facility for skateboarding, the ability of the city to deliver excellent year-round benefit to young people is significantly compromised. A permanent year-round indoor facility in Cambridge would create continuity, safety, and inclusive access that outdoor spaces alone cannot deliver.</p>	210570 (Camskate)
<p>At Cam Skate or community includes skaters of all ages, coaches, and volunteers ready to support structured programmes, but without a permanent indoor space, these cannot be delivered consistently. A permanent indoor venue would become a positive, stable anchor for community engagement, helping young people build identity, resilience, and supportive peer networks. This reflects findings from both national research and local case studies across the UK.</p>	210571 (Camskate)

<p>An indoor skatepark would advance key Local Plan objectives by:</p> <ul style="list-style-type: none"> • Improving health and wellbeing Skateboarding provides accessible physical activity for diverse groups, including those underserved by traditional team sports. • Supporting inclusive and resilient communities Evidence shows skateparks foster belonging, reduce antisocial behaviour, and encourage cross-age and cross-cultural interaction. • Providing essential youth and social infrastructure Cambridge lacks affordable, accessible indoor recreation for young people—an indoor skatepark would fill a clear infrastructure gap. • Enhancing social value and urban vibrancy Skate spaces contribute to inclusive place-building, urban regeneration, and community engagement. 	210572 (Camskate)
<p>I strongly encourage the Greater Cambridge Local Plan to:</p> <ol style="list-style-type: none"> 1. Recognise a permanent dedicated indoor skateboarding facility as a critical element of social and community infrastructure within Cambridge and highlight the value The Warehouse indoor skatepark has brought to Cambridgeshire. 2. Allocate or support land allocation for an indoor skatepark within Cambridge city, ensuring active travel accessibility. 3. Collaborate with community organisations, Skateboard GB, and youth groups to co-design a space that is inclusive, sustainable, and future-proof. 4. Integrate this project into wider strategies for youth provision, health, and community wellbeing. 	210573 (Camskate)
<p>Leisure facilities in Great Shelford are limited.</p>	210942 (Great Shelford PC)
<p>We note a significant deficit of outdoor sports facilities in the Royston area and request that the draft plan consider provision of such infrastructure to meet cross-boundary health and wellbeing objectives.</p>	203258 (North Herts Council)

<p>Community, sports and leisure facilities only benefit those who can travel to them easily and affordably. This policy should prioritise access to those facilities by walking, cycling and public transport. This will both reduce the negative impacts of increased car traffic and ensure they can be used by all.</p>	<p>203238 (Cambridge Area Bus Users)</p>
<p>It is recognised that community, sports and leisure facilities are a key element of a successful community.</p>	<p>211543 (Martin Grant Land Limited)</p>
<p>It should be recognised that football stadia are not Main Town Centre Uses, and that Part C does not apply to ancillary retail, food and beverage provision. The supporting information confirms that sports stadia are to be considered through this draft policy. It should be explicitly stated in the supporting text that the redevelopment or relocation of the Cledara Abbey Stadium is addressed under a specific allocation, and Policy WS/CF does not apply to the current Stadium or a relocation site.</p>	<p>211870, 211871 (Cambridge United Football Club)</p>

Policy WS/CH: Cultural and creative hubs

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

Comments were made by many individuals and organisations supporting Cambridge Junction's request that: operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs; flexibility is embedded to allow culture to evolve over time; and stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership model. These should ensure cultural hubs are viable, adaptable and resilient. Other supporting comments raised the matter of funding these needs.

Comments about the definition of a cultural or creative hub were made by the Cambridge Green Party who supported the policy and recommended all the policy criteria in paragraph 1 be satisfied and not just 'most of'.

Brookgate Land Ltd & Network Rail Infrastructure Ltd. objected to this policy as currently worded. The policy should define what constitutes a 'cultural and creative hub', providing expected quantum, floorspace thresholds and relevant use classes.

Comments were made by many individuals and organisations supporting Create Cambridge's request for: the Agent of Change principle be explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues; and major developments demonstrate access, including late-evening transport for the wider region, not just immediate residents.

There was considerable support, with reference to S/PRIA/EG that the Elizabeth Way bridge and Underpass(es) become a cultural hub project and benefits this project would bring to the local community.

Girton PC requested the Local Plan support local, flexible cultural hubs integrated into existing community buildings; recognise Girton's heritage assets as cultural anchors; and ensure cultural provision strengthens a distinct village identity, not urbanisation. The importance of libraries was also cited with Cambridgeshire County Council highlighting the opportunity to co-locate library operations in arts/cultural hubs.

Other comments included one member of the public stating that the policy lacked a reference to sustainable travel. Every new town, and district/area in Cambridge should have access to a neighbourhood centre and Cambridge North should have an equivalent "The Junction" style venue. Comments included the need for additional affordable and flexible cultural facilities, including 'makerspaces' or 'fablabs', available for booking by community groups and individuals. An indoor skatepark was also suggested which would provide enormous value to the mix of leisure and cultural facilities within the city. Recent creative graduates and young creatives should have access to shared workspaces, exhibition and networking spaces. The policy should also safeguard existing cultural and creative spaces. Workshop spaces should function as. Design processes for new cultural facilities should demonstrate serious public engagement at design stage.

[Response to main issues raised in representations:](#)

Policy WS/CH's paragraph 2(l) includes a clause requiring new creative or cultural hubs to have a Management Strategy to ensure it will be viable in the long-term. This should outline, as a minimum, its long-term vision, objectives, market sector within the wider cultural or creative market, and financial resourcing. Where policy WS/NC: Meeting the needs of new and growing communities

requires the provision of cultural infrastructure, Cultural Plans will need to be submitted as part of the planning submission process. These will need to demonstrate a robust, evidence-led and locally responsive approach to their provision and long-term viability. These plans will be secured through Section 106 agreements.

Cultural and creative hubs can take various forms and are generally defined by their unique combinations of uses, activities and cultural/commercial focus. For this reason, not all proposals would be expected to meet all the policy criteria. Regarding their expected quantum, floorspace thresholds and relevant use classes, it is difficult to define cultural and creative hubs in these traditional land use terms. Traditional examples would include: an arts centre, a performance venue, a national and, or internationally recognised museum which support cultural activities within the community and or provide training/learning opportunities. More diverse examples would might include a creative workspace space supporting independent yet related creative businesses. They might be separate sole-traders or entrepreneurs, but they all work in the same creative industry e.g. ICT or CGI digital post-production activities. There could be mix of small private businesses working with a public sector cultural organisation or a third-party provider, again working on similar or related projects. The size of these hubs may vary depending on the financing arrangements. These could include spaces secured via Policy J/AW: Affordable workspace and creative industries which seeks to seeks affordable workspace in large commercial developments. Cultural and creative hubs would have sufficient capacity to bring together and support an ecosystem of cultural activities and, or creative artists or creative/cultural organisations (public or commercial). The Local Plan is seeking to establish the policy criteria that would encourage new, genuine cultural and creative hubs to come forward that are sustainable over the long-term. That does not mean proposals such as Elizabeth Way bridge and underpass could not form a cultural hub in the future, subject to planning permission.

Policy J/RC: Retail and other complementary town centre uses, paragraph 4(b) explains that residential development in centres will only be supported where there are no nearby businesses linked to the evening / night-time economy and, or alternative cultural / live music / performance venues, which would be likely to attract noise complaints or have their operations restricted due to the development. Policy J/SA: Cambridge City's Primary Shopping Area (PSA), paragraph 5, reflecting the role of the PSA as a sub-regional centre for retail and other town centre uses, including the nighttime economy, proposals for residential development within the PSA (except for hotels) will be resisted to protect the wide range of existing cultural venues from residential uses that would put such spaces at risk from noise complaints or have their operations restricted from the development. New developments will normally contribute to transport improvements however they are unlikely to be large enough to support specific late-night transport.

Policy WS/CH explains the requirements that need to be satisfied for new cultural / creative hubs in new and existing designated centres. While the integration of cultural hubs into a community build may be feasible including heritage buildings, outside a designated centre this form of proposal may not be an appropriate sustainable location. New and enhanced cultural facilities are supported by Policy WS/CF: Community, sports, and leisure which sets out the policy guidelines for such proposals.

Policy J/RC: Retail and other complementary town centre uses establishes Greater Cambridge's Hierarchy of Designated Centres. These should ensure all communities have access to a 'local' centre commensurate in size and function to their catchment area. It also includes emerging centres which will come forward during the plan period. The Junction is a sub-regional facility serving not just Cambridge but South Cambridgeshire residents and the wider surrounding area. These facilities also often need some sort of financial assistance to keep them open. Providing a second venue like 'The Junction' in terms of size and type would lead to direct competition with 'The Junction' and undermine its long-term viability. These types of facilities need to be carefully planned such that new cultural facilities, often supported by public subsidy do not undermine similar facilities.

Sustainable travel is covered by policy I/ST: Sustainable transport and connectivity which would be applicable for new cultural or creative hub. It should be noted that cultural hubs are only supported in Designated Centres listed under Policy J/RC. The location of designated centres and their constituent town centres uses are very much determined by their accessibility, as such their location is inherently central to the area they serve and highly accessible by a variety of sustainable forms of transport. Cultural facilities are protected under Policy WS/CF: Community, sports, and leisure facilities.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>I support Cambridge Junction in asking that:</p> <ul style="list-style-type: none"> • operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs • flexibility is embedded to allow culture to evolve over time • stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership model <p>This ensures cultural hubs are viable, adaptable and resilient.</p> <p>I support Create Cambridge in asking:</p> <ul style="list-style-type: none"> • the Agent of Change principle is explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues • major developments demonstrate equitable access, including late-evening transport for the wider region, not just immediate residents 	<p>202134 (Cambridge Junction), 202192 (H Tam), 202680 (T Altmann), 202710 (W Townsend), 202775 (S Lee), 202858 (Cambridge Junction), 202920 (R Tarry), 202980 (T Flinders), 204799 (M Cleminson), 202008 (H Chamberlain), 202746 (Cambridge Junction / Create Cambridge), 204662</p>

(NEUBAU Architects), 205279
(N Oakley), 205385 (L
Howse), 203618 (University of
Cambridge, Z Svendsen),
204151 (Cambridge Junction /
Create Cambridge), 202287
(Cambridge Junction / Create
Cambridge), 202295
(Cambridge Junction / Create
Cambridge), 202380 (J
Webber), 202385 (Kettle's
Yard), 202391 (T Shaw),
204811 (L Matthews), 205268
(AC de Azevedo Lamha),
204366 (New International
Encounter), 203494 (D
Lever), 203470 (L Heap),
203425 (S Ashworth),
203319 (N Ellis), 202805
(Cambridge Junction),
202457, 202455 (K Jones),

	204685 (A Giarlis), 205003 (H Paterson)
<p>I support Cambridge Junction in asking that:</p> <ul style="list-style-type: none"> Operational sustainability (management, revenue, long-term viability) is explicitly required alongside spatial and design briefs Flexibility is embedded to allow culture to evolve over time. Stronger links are made to delivery mechanisms, including the Cultural Infrastructure Strategy and partnership models. This ensures cultural hubs are viable, adaptable and resilient. 	203845 (N Yeni), 204899 (Wysing Arts Centre), 205017 (University of Cambridge), 205098 (J Walsh), 205338 (A Seiglow), 205356 (Cambridge Junction),
I support Create Cambridge in asking that: the Agent of Change principle is explicitly embedded, placing responsibility for mitigation on new residential development, not existing venues major developments demonstrate equitable access, including late-evening public transport, so hubs serve the wider region, not only immediate residents.	203863 (University of Cambridge), 207588 (N Yeni), 207521 (N Ellis)
Support the proposal to transform the Elizabeth Way underpass into a cultural and creative hub. This space is currently under-used and unwelcoming, acting as a physical and psychological barrier rather than a connector. Reimagining it as a place for culture, creativity and community activity would significantly improve the public realm while addressing safety, accessibility and wellbeing.	204972 (C Sharman), 205294 (Z Svendsen, University of Cambridge), 204350 (Cambridge Junction / Create Cambridge), 204349, 204342, 204337, 204334, 204330, 204328 (Cambridge Junction / Create Cambridge), 204347

	(Cambridge Junction/Create Cambridge), 204239 (A Giarlis), 204312, 201849 (NEUBAU Architect), 207918 (K Fisher) 205274 (R Good)
<p>We welcome the policy's support for cultural infrastructure and affordable creative workspaces and recommend amending 2.a to require delivery of most or all criteria in paragraph 1.</p> <p>With reference to S/PRIA/EG and the Elizabeth Way bridge and underpass project, we support reusing bridge, underpass and leftover public realm spaces for affordable community and youth facilities, arts and culture, indoor and outdoor sport, markets, food and business uses that support learning, networking and employment.</p>	203704 (Cambridge Green Party)
Support Point 1a: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, recent creative graduates and young creatives should have opportunities within the urban creative environment to afford shared workspaces, exhibit and network.	204464 (K Fisher)
Support Point 1b: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, combining Arts with an integrated Youth programme could generate natural overlaps and opportunities for Learning between youth and young adults including students and creative groups and individuals, this could include outreach programmes to include youth and young people requiring social integration.	207911 (K Fisher)

<p>Support Point 2h: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support proposals that seek public realm improvements and regenerate for use the empty spaces underneath the Elizabeth bridge and underpasses, for use as a cultural/creative, urban sports and community hub. This could diversify local cultural offerings and facilitate affordable, creative workspaces as well as promote a new urban identity for this currently neglected 70s site. Improvements of the adjacent public realm would seek public engagement with urban sports and recreation and link these offerings with existing and desired pedestrian and cyclist movements, between the wards and along the river promenade, linking back to the centre.</p>	<p>207912 (K Fisher)</p>
<p>Support Point 2i: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support local labour and the provision of workspaces for local SMEs to promote Cambridge local small to medium size businesses and start ups through affordable space provisions including Artists workshops, makespaces, exhibition spaces, shops a.o. as well as offering apprenticeships and access to the creative industry and opportunities for youth and young people / students and graduates.</p>	<p>207913 (K Fisher)</p>
<p>Support Point 2j: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support a cultural hub which adopts external spaces attached for an active, outdoors programme and spontaneous public engagement. The Underpass project has already shown that an existing space can be re-imagined with active cultural engagement. This has worked well with artists seeking an urban venue or vessel for various installations, as an alternative to programmed spaces. Creative expression and engagement can be in the form of physical, audio, visual, digital, theatre or other modes of engagement for public events.</p>	<p>207914 (K Fisher)</p>

Support Point 2k: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, research into demand for offerings should coordinate efforts with the council and the wider creative community active in Cambridge. Early feedback indicates a need for affordable, flexible and large cultural spaces which are not subject to market economical constraints.	207915 (K Fisher)
Support Point 2l: With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I strongly support proposals that seek out commercial and community uses compatible with sustainable development and operations of a cultural/creative hub. Proposals should complement the nature and style of the 70s concrete infrastructure and programmes should support new cultural provisions on the basis of market research and demand. A vision statement is required to identify early ambitions and long term operational viability of the venture.	207916 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, I support the reversal of public space uses to allow for spontaneous and active engagement, including reversal of common urban prejudice when it comes to urban sports and creativity, and encouragement such as 'play ballgames here', 'paint this wall' and 'skater friendly furniture'.	207917 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, a cultural hub can also include external spaces attached to an active internal programme.	207918 (K Fisher)
With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project, a cultural hub can also include external spaces attached to an active internal programme.	204452 (K Fisher)
Buildings hosting cultural and creative facilities should be distinctive externally. Avoid the 'Clay Farm' model of a bland box with bland expensive abstract sculpture plonked in front. Such buildings should be landmark/wayfinding buildings that make it easy for people to find each other in what can be a sea	203809 (A Carpen)

<p>of identikit buildings. Design processes should demonstrate serious public engagement *at design stage*.</p>	
<p>Support for the arts across the District should be widespread to ensure access for all residents, as individuals, small groups and potential businesses. The Plan should include provisions for community and ad-hoc groups in strategic new developments, ensuring access to cultural resources.</p> <p>A performance and workshop space should be funded through S106 contributions, with staff support for a period of 12, 24, or 36 months to get the activity to a sustainable state. Workshop spaces should function as 'makerspaces' or 'fablabs', supporting activities like Lego and crafts, and be available for booking by community groups and individuals. Performance spaces should be well-equipped, bookable, and designed to accommodate a small audience.</p>	205447 (R Stobart)
<p>Cultural identity in Girton stems from heritage assets, village history, and community-led spaces rather than large cultural complexes. Pavilion and Rec serve as community gathering points. Heritage-based identity (e.g., Girton Gap, village form) must guide cultural development. Community-scale creative activity thrives in flexible, multi-use spaces. GPC Requests to the Local Plan: Support local, flexible cultural hubs integrated into existing community buildings. Recognise Girton's heritage assets as cultural anchors. Ensure cultural provision strengthens a distinct village identity, not urbanisation.</p>	202227 (Girton PC)
<p>Should insert into this policy that genuine efforts should always be made to reach out to, engage with, enrich and support activities that are already underway (or that would be valuable if they *were* underway) at local schools, diverse local community centres, youth groups, clubs, social clubs of all kinds - including for older residents or those with disabilities, and other elements of the community</p>	202527 (J Neal)

across the generations. Wouldn't it be good to try to build community - not just supplant it with something new?	
This policy does not quite go far enough. It is missing the requirement for sustainable travel (such as in Policy WS/CF) or active travel (as in Policy WS/HD).	203150 (P Tribble)
Rural active travel routes and PROWs should be bridleway to include horseriders.	203989 (S Rogers)
Opportunity to co-locate or better still make buildings work harder. Many libraries operate 28 hours a week, can the shelving fold away to be used as an arts/cultural hub outside – see Fore Street Living Room Library – Jan Kattein Architects Architecture, planning & communities. Or at a smaller level Melbourn hub, Gamlingay Eco hub and EverySpace Everyplace – Jan Kattein Architects Architecture, planning & communities. Trying to link up better quality community spaces that are sustainable through multi use and investment upfront inflexible buildings.	210533 (Cambridgeshire County Council)
An indoor skatepark offers a completely new piece of cultural infrastructure within Cambridge and through creative programming it provides a dynamic and varied offer within the city. From skate lessons to roller disco, to pop-up sauna and wellbeing events, an indoor skatepark can add enormous value to the mix of leisure and cultural facilities within the city	210565 (Cam Skate)
Policy should quantify the scale of need and recognise the need for major new cultural attractions and infrastructure to offset the pressures on city centre attractions. The policy should safeguard existing cultural and creative spaces.	203365 (Cambridge Past, Present and Future)
Libraries are an essential part of any community. This not just an education issue. Libraries are an introduction for children to our culture, a sources of information for all, a recreational facility, and a link between the past, present and future.	202178 (M MacGinley)

<p>Strongly support, but this needs funding to be realised. This sort of arts environment is generated from the ground up, so needs a way to be bootstrapped by individual artists and small collectives.</p>	<p>202829 (H Cook)</p>
<p>Every new town, and district/area in Cambridge should have access to a neighbourhood centre - one that has excellent public transport links that enables access beyond the immediate neighbourhood to help sustain them. An equivalent of "The Junction" should be built in North Cambridge with easy access to residential communities and close to medium-density housing and/or schools. There should be extensive meeting rooms and rehearsal spaces given the significant shortage in Cambridge. There should also be provision for large dance and exercise classes given the loss of affordable community hall space (eg St Columbas) in recent decades.</p>	<p>203802 (A Carpen)</p>
<p>Object to this policy as currently worded. Overly broad and lacks sufficient clarity, contrary to the requirements of the NPPF for policies to be clear and effective. In particular, the policy fails to define what constitutes a 'cultural and creative hub', providing no indication of expected quantum, floorspace thresholds, or relevant use classes.</p>	<p>204389 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)</p>
<p>It is recognised that cultural/creative hubs are a key element of a successful community.</p>	<p>211544 (Martin Grant Land Limited)</p>

Policy WS/MU: Meanwhile uses during long term developments

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was broad support for the policy and the important role of meanwhile uses in: providing flexibility; site activation and vibrancy; the maintenance and creation of activity in particular in addressing community needs; the promotion of inclusive growth; masterplan implementation and placemaking; the facilitation of efficient land use; helping with the logistics of setting up a new community; and the deliverability of allocations.

A large number of comments supporting Create Cambridge ask that: the policy is a requirement for Areas of Major Change and large scale phased developments; meanwhile strategies address the activation of vacant sites, governance and exit pathways; cultural / community uses are included throughout construction periods; long-term vacant units are proactively enabled for cultural use & artists are involved in shaping terms; and trust-style models are explored to secure permanent affordable space.

There was concern that the policy should allow flexibility in the duration of meanwhile uses on differing sites and ensure that meanwhile uses consider compatibility with surrounding uses and not impede long term site objectives. Increased clarity on what is considered “a long period of time” was requested, as was a site-specific based policy which in some circumstances may be to leave land unused.

Suggestions included strengthening of policy wording, to further encourage the efficient use of buildings and land, to support meanwhile uses that enable continuity of access to community, sports and youth facilities and to provide safe routes for horse riders. A gap in the provision of skate parks and their importance as social infrastructure, enhancing wellbeing, social cohesion, safety, and community belonging was raised. One comment made highlighted the importance of partnership working to ensure success of meanwhile use schemes. Another highlighted mixed results for meanwhile uses on sites in Cambridgeshire.

Response to main issues raised in representations:

Comments supporting the policy approach are noted.

A number of comments supported the principle but sought clarify and certainty on its implementation. The policy wording has been reviewed to address these points, including providing clarity on phased development where a meanwhile use strategy will be required.

The potential for cultural or employment uses at the Elizabeth Way bridge and Underpass(es) is noted. Policy S/PRIA/EG: Eastern Gate has been amended to reflect the opportunities of this area.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
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<p>Support selected</p>	<p>202483 (M Parsons, University of Cambridge), 203084 (Trinity College, Cambridge), 203354 (BMR Granta Park Propco Limited), 204446 (Tritax Big Box Developments), 204680 (B Lenz, NEUBAU Architecture Ltd)</p>
<p>Supportive of the policy as:</p> <ul style="list-style-type: none"> • Meanwhile uses can provide flexibility during phased development, activate sites ahead of permanent development, and support the effective implementation of the overall masterplan strategy. • Meanwhile uses play an important role in maintaining activity, meeting community needs, and enhancing the vibrancy of sites during phased delivery. • For long-term, strategic development, for example, for whole-site outline applications at North East Cambridge, the ability to accommodate meanwhile uses is integral to the deliverability of the allocation. • The supportive approach to meanwhile use (as put forward by Cambridge Ahead’s Young Advisory Committee) is welcome, recognising its role in promoting inclusive growth and contributing to placemaking, particularly within large-scale developments. 	<p>202483 (M Parsons, University of Cambridge), 203084 (Trinity College, Cambridge), 203354 (BMR Granta Park Propco Limited). 203526 (E Pritchard, Cambridge Ahead), 204446 (Tritax Big Box Developments)</p>

<ul style="list-style-type: none"> The policy appropriately recognises that some large-scale development proposals may remain temporarily undeveloped for extended periods of time. 	
<p>Support for Create Cambridge's asks that:</p> <ul style="list-style-type: none"> a Meanwhile Strategy is required at validation for Areas of Major Change and large phased developments strategies set out activation of vacant sites, governance arrangements, exit pathways to permanent provision cultural/community uses are embedded throughout long construction periods, not only at completion long-term vacant units are proactively enabled for cultural use; artists involved in shaping terms clear exit pathways prevent displacement when redevelopment proceeds creative commons/Creative Land Trust-style models are explored to secure permanent affordable space Create Cambridge is engaged as a key consultee on delivery models, drawing on national and international precedents 	<p>202197 (H Tam), 202303 (L Mills, Cambridge Junction), 202314 (S Yusuf, Cambridge Junction/Create Cambridge), 202752 (C Woods, Cambridge Junction/Create Cambridge), 202866 (R Tinkler, Cambridge Junction), 204166 (M Burman, Cambridge Junction/Create Cambridge), 202384 (J Webber), 202869 (B Groisman, Cambridge Junction), 205394 (E Hine), 202406 (Kettle's Yard), 202408 (T Shaw), 202459 (K Jones), 202714 (W Townsend), 202781 (S Lee), 202928 (R Tarry), 202975 (T</p>

Flinders), 203020 (V
Beechey, The Arts Theatre
Cambridge), 203334 (N
Ellis), 203432 (S Ashworth),
203488 (L Heap), 203514 (D
Lever), 203627 (Z
Svendsen, University of
Cambridge), 203849 (N
Yeni), 203869 (University
Cambridge), 205033 (L
Sheerman, University of
Cambridge), 204992
(Wysing Arts Centre),
203869 (J Fritsch, University
of Cambridge), 204680 (B
Lenz, NEUBAU Architecture
Ltd), 204699 (A Giarlis),
204827 (L Matthews),
205064 (H Paterson),
205129 (J Walsh), 205287
(A C de Azevedo Lamha),

	205303 (N Oakley), 205320 (L Howse), 205370, 205384 (A Seiglow)
The University supports this policy for suitable meanwhile uses during long term developments	202483 (M Parsons, University of Cambridge)
Partnership working between organisations, asset owners, developers and local authorities will be important to ensure the success of meanwhile use schemes.	203526 (E Pritchard, Cambridge Ahead)
Welcome this policy's encouragement of the efficient use of existing buildings and land. To further strengthen this encouragement, recommend amending "where appropriate" in point 2 to "where possible." This more clearly prioritises the accommodation of meanwhile uses.	203705 (R Comins, Cambridge Green Party)
Point 3 contains a typo: "meanwhiles" should be "meanwhile".	203705 (R Comins, Cambridge Green Party)
In the supporting information, we recommend adding a sentence immediately after the first paragraph to state "Meanwhile uses can be applied to any temporarily vacant property, whether commercial or residential, as well as to vacant land." This encourages the efficient use of all types of buildings and land.	203705 (R Comins, Cambridge Green Party)
The policy should allow flexibility in the duration of meanwhile uses to reflect differing site circumstances, development phasing, and market conditions. Meanwhile uses must remain compatible with surrounding uses and should not impede the long-term development objectives for the site. A	203354 (BMR Granta Park Propco Limited)

flexible, supportive approach will ensure sites contribute positively throughout the redevelopment period.	
TCE is supportive of the principle of meanwhile uses, however clarification is needed in the policy wording as to what is considered “a long period of time”. The policy is currently too open ended; for instance an underused/vacant site or building for a period of 5 years in a 15-20 year masterplan might not be considered “a long period of time” on the context of the wider masterplan.	203587 (The Crown Estate)
The policy is not written well but it is a good idea.	201248 (S Williams)
The policy should require continuity of access to community, sports, and youth spaces during works and allow temporary recreation facilities where needed to keep social inclusion intact.	202228 (Girton PC)
Support community-led meanwhile uses that strengthen engagement.	202228 (Girton PC)
Meanwhile uses can include permissive bridleways to provide much needed safe routes for horseriders which walkers and cyclists can also enjoy.	203992 (S Rogers)
The application of the policy must be considered on a site-specific basis to ensure that the most appropriate strategy is pursued, which in some circumstances may be to leave land unused.	204446 (Tritax Big Box Developments)
When Cam Skate’s current meanwhile use lease is finished at 3-5 Coldham’s Lane, this will result in a major gap in year-round youth provision, physical activity access, and inclusive recreation. Evidence from national government, academic research, and community development studies strongly supports the role of skateboarding spaces as vital social infrastructure, enhancing wellbeing, social cohesion, safety, and community belonging.	210561 (Cam Skate)

<p>Mixed success with this, we have had it at Northstowe, Alconbury and Waterbeach to help create new hubs for communities to engage with.</p> <p>However, things like building in spaces for visit from food trucks and the mobile library can help with logistics of a new community as it sets up before permanent facilities are in place (learning from Northstowe).</p>	<p>210596 (Cambridgeshire County Council)</p>
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Policy WS/IO: Creating inclusive employment and business opportunities through new developments

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

There was general support for the policy with a recognition that successful places are shaped not only by physical development but by inclusive, healthy and socially connected environments. It will help ensure that existing residents will be able to benefit from the economic growth of the area. Suggestions were made for the use of any funds received including education facilities and support for students and an offer was made of working with the Adult Education Service in the area.

A number of respondents supported the policy but with the caveat that it be applied in a flexible and proportionate manner, having regard to the nature, scale and phasing of individual developments, as well as the operational requirements of occupiers to ensure that is effective and deliverable.

There was also concern that policy thresholds, and the requirement for an Employment and Skills Plan could impact construction commencement and deliverability particularly if this is important for site viability, placing additional administrative burdens becoming barriers to commencing construction programmes. Concerns were also expressed the impact on the business plans of SMEs alongside requests that the threshold requirements for housing developments be raised. It was requested that construction not be halted if there are difficulties in implementing a plan.

Where there were objections, with one respondent stated that the policy lacks an evidence base, justification and consistency with national planning policy, potentially discriminating against those living outside Greater Cambridgeshire.

A number of comments support the creation of new hub at the Elizabeth Way bridge and Underpass(es), supporting cultural uses and artists enabling employment, training and outreach opportunities for young people.

Response to main issues raised in representations:

Representations supporting the policy and its approach are noted.

The policy approach is justified by national and local policy considerations, in to address local inequalities and skills shortages. Further information on both of these areas was set out in our Wellbeing and Social Inclusion Topic Paper in 2025. There are a range of examples of similar policies being operated in other areas where these issues are also present. Evidence for the need for a policy has been clearly established. Further details have been added to the Proposed Submission Local Plan to clarify elements of its implementation.

Some comments highlight opportunities regarding how the policy could be delivered, and linkages to other schemes. The policy is flexible enough that specific opportunities can be responded to during implementation. The policy also includes a mechanism for in lieu payments where measures cannot be delivered on site. Some comments raised issues regarding site specific implementation, but the policy has sufficient flexibility to respond to site specific circumstances.

One comment questions the threshold applied in the policy. The policy seeks to learn from examples of good practice in the implementation of Local Plan policies across the UK. 1,000 sqm of non-residential floorspace and 10 homes are considered a reasonable starting point for the requirement for Employment and Skills Plan. The use of the recently updated CITB benchmarks at construction stage ensures that the asks from developers are proportionate to the nature and scale of development. The asks at occupation stage will be similarly proportionate.

The potential for cultural or employment uses at the Elizabeth Way bridge and Underpass(es) is noted. Policy S/PRIA/EG: Eastern Gate has been emended to reflect the opportunities of this area.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support selected	202487 (M Parsons, University of Cambridge), 203037 (K Porrer, Cambridge City Council Liberal Democrat Group), 203088 (Trinity College, Cambridge), 204219 (L Cooke), 204243 (A Giarlis),

	<p>204326 (B Lenz, NEUBAU Architect), 204450 (Tritax Big Box Developments), 204726 and 204793 (T Woodcock), 204804 (M Cleminson), 205203 (M Burman, Cambridge Junction/Create Cambridge), 207447 (Pioneer Group Ltd), 211545 (Martin Grant Land Limited)</p>
Object selected	<p>202486 (M Parsons, University of Cambridge), 204989 (A Brand, Abbey Properties Cambridgeshire Limited)</p>
<p>Requests the plan: safeguard space for local enterprise, small business units, co-working. Residents favour small enterprises, retail, co-working, and shared community hubs; support community-scale enterprise hubs within Girton's development framework as this supports rural economic resilience; and recognise landowner diversification as part of inclusive employment.</p>	<p>202229 (Girton PC)</p>

<p>Some opportunities to work with Adult Education to support this offer and specifically the Business and Intellectual Property to support new opportunities that can develop in new community. Business & IP Centre Cambridgeshire (BIPC) Cambridgeshire County Council. Potential to buy into specific project work in a community to support ambitions.</p>	<p>210597 (Cambridgeshire County Council)</p>
<p>No evidence is provided at this stage to assess the soundness of this policy. Evidence base needs to be provided prior to the next stage of plan.</p>	<p>202486 (M Parsons, University of Cambridge)</p>
<p>The University support the policy which keeps the special quality of Cambridge and the surrounding area, ensuring that it continues to be a place where people want to live, learn, work and play.</p>	<p>202487 (University of Cambridge)</p>
<p>We strongly support this policy with the new Employment and Skills plan at both construction and occupation stages.</p>	<p>203037 (K Porrer, Cambridge City Council Liberal Democrat Group)</p>
<p>The requirement for new developments of 1,000 sqm or more of floorspace within commercial and flexible use classes to submit and implement an Employment and Skills Plan at both the construction and occupation stages is SUPPORTED.</p> <p>In supporting this requirement, it is considered important that Employment and Skills Plans are applied in a flexible and proportionate manner, having regard to the nature, scale and phasing of individual developments, as well as the operational requirements of occupiers. An appropriately tailored approach will ensure that Employment and Skills Plans remain effective, deliverable and aligned with existing initiatives across the Cambridge Science Park, while continuing to provide meaningful benefits to the local community and workforce.</p>	<p>203088 and 211490 (Trinity College, Cambridge)</p>

<p>From a socio-economic perspective, a key factor affecting social inclusion is access to education and training opportunities for existing residents, which in turn facilitate the ability of those residents to access and reap the benefits of the jobs delivered by economic growth. Ensuring that residents have the opportunities to develop their education and training levels, such as those that would be afforded by Cambridge Science Park North (HELAA Reference 40096) through job opportunities, apprenticeships and the development of the Cambridge Regional College (CRC), would be key to promoting wellbeing and social inclusion for Greater Cambridgeshire residents.</p> <p>Without skilled manufacturing opportunities in Cambridge, there will be a shortage of job opportunities for people who want to work in a technical or engineering environment but do not have the qualifications to undertake the roles that require a university degree. These include students at the Cambridge Regional College and North Cambridge Academy. If Cambridge allocate sufficient space to accommodate the manufacturing space required by these companies in a sustainable location, a real opportunity exists to develop and nurture this category of jobs.</p>	<p>211483 (Trinity College (CSP) Limited)</p>
<p>Provision should be made for firms/developers to contribute towards</p> <ul style="list-style-type: none"> • a capital fund to pay for a new large lifelong learning college and similar facilities. • a fund that offers maintenance grants for people willing but unable to retrain/switch careers into sectors where the local economy has chronic skills shortages • facilities for the circular economy including repair centres and local reuse centres. 	<p>203804 (A Carpen)</p>
<p>Whilst the objectives of this policy are laudable it is contended that the threshold at which this policy applies should be set higher. In the case of schemes of 10 dwellings it is likely that the scheme would</p>	<p>203343 (ESCO Prospect)</p>

<p>be built by a small contractor who has an established workforce in under a year from approval. The threshold should be raised to +50 dwellings.</p>	
<p>Applaud the policy’s intention to address the poverty and skills gap in Greater Cambridge and to support community wealth building. To better support these aims, amending 3.c is recommended to read: “How these opportunities will be made available and actively communicated to local residents [...]” so that the onus is on the developer to make residents aware of new business, employment and training opportunities. This will help to ensure that jobs and training created by development genuinely benefit the local community.</p>	<p>203706 (R Comins, Cambridge Green Party)</p>
<p>The policy appropriately recognises that successful places are shaped not only by physical development but by inclusive, healthy and socially connected environments. The policy’s emphasis on social inclusion, health and wellbeing, through accessible services, community facilities, inclusive design and connectivity, aligns with national planning policy and the Local Plan’s placemaking objectives.</p> <p>Inclusive design and community wellbeing as integral to sustainable development. Tritax Park, Cambridge will seek to incorporate measures that support social interaction, accessibility and active lifestyles, helping to create healthy, resilient and socially inclusive places.</p>	<p>204450 (Tritax Big Box Developments)</p>
<p>Support in principle. Concerns that the requirement for an Employment and Skills Plan could impact construction commencement and deliverability particularly if this is important for site viability. Mandatory training, apprenticeships, and supply-chain commitments could introduce administrative burdens, unforeseen S106 style costs and procurement complexity particularly difficult for smaller urban schemes with short construction programmes. A change is requested to allow flexibility in the policy wording,</p>	<p>204855 (Hill), (Carter Jonas).</p>

<p>ensuring that construction can commence or not be halted due to difficulties concerning the implementation of an Employment and Skills Plan.</p>	
<p>The policy lacks justification and consistency with national planning policy, potentially discriminating against those living outside Greater Cambridgeshire. Part 2 of the policy sets a low threshold for the Employment and Skills Plan, which may force small and medium-sized businesses to deviate from their business plans for developments of 10 dwellings, potentially deterring project progression.</p> <p>Part 4 references local residents, specifically those in Greater Cambridgeshire, but lacks a specified target. This could disadvantage workers in closer locations to developments but outside the district boundary. This seems unsustainable. Is the intention for such sites to have a lower target? The policy lacks clarity.</p>	<p>204989 (A Brand, Abbey Properties Cambridgeshire Limited)</p>
<p>Active Travel corridors for commuting are also widely used for leisure. Therefore, they should be public bridleway to include horseriders.</p>	<p>203997 (S Rogers)</p>
<p>We support the Councils in seeking to maximise local economic opportunities through major developments</p>	<p>207447 (Pioneer Group Ltd)</p>
<p>Support for creating a new cultural hub at the Elizabeth Way bridge and Underpass(es) (S/PRIA/EG), a mix of uses will create employment opportunities for graduates, startups, makers and creatives seeking affordable workspace</p> <ul style="list-style-type: none"> • A creative hub helps to promote a sustainable, resource-efficient neighbourhood. • Support integration of young people with the arts and public realm. • Include youth outreach and education programmes, apprenticeships and learning opportunities, informed by council market research and needs/gaps 	<p>204219 (L Cooke), 204243 (A Giarlis), 204804 (M Cleminson), 205203 (M Burman, Cambridge Junction/Create Cambridge), 204326 (B Lenz, NEUBAU Architect),</p>

<ul style="list-style-type: none"> • Provide commercial and self-organised recreation, open access sports provisions including urban skating, active landscaping 	
<p>Support local retention of labour and SMEs with reference to S/PRIA/EG and Elizabeth Way bridge and Underpass(es) cultural hub project, Key to future-proofing operational sustainability is to promote Cambridge local small to medium size organisations through affordable space provisions including Artists workshops, makespaces, exhibition spaces, shops a.o. as well as offering apprenticeships and access to the creative industry and opportunities for youth and young people /students and graduates. Commercial anchor functions could include local, ethical food + beverage offerings as well as local sports clubs, entertainment, recreational provisions supporting day and nighttime economies, in line with local demand.</p>	204726 (T Woodcock)
<p>With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, the retention as a noteworthy 70's Heritage asset is supported. In 1950 the architect / town planner Lord William Graham Holford produced a report for Cambridge County planning, proposing a comprehensive road framework the scale of which was unprecedented in the history of Cambridge transport planning, leading to construction of the infrastructure in 1969. This introduced environmental and social challenges to the local residential area. I support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.</p>	204793 (T Woodcock)
<p>We propose securing the Employment and Skills Plan through a pre-commencement condition rather than at outline stage.</p>	208358 (T Elbourn)
<p>It is recognised that inclusive employment and business opportunities are a key element of a successful community.</p>	211545 (Martin Grant Land Limited)

Policy WS/HS: Pollution, health and safety

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

A number of representors expressed broad support for the policy. Great Shelford and Stapleford Parish Councils supported the approach to addressing light pollution. Anglian water highlighted the need to ensure proposals do not put at risk the operation of existing infrastructure.

Natural England said the policy should include consideration of environmental impacts in relation to air pollution. On light pollution they advised the plan should reference impact in protected sites including Eversden and Wimpole Woods. The Cambridge Green Party suggested it should reference soil and water, and be clear the policy applies to construction and end use. Cambridgeshire County Council proposed adding reference to overheating. The Environment Agency request reference to various guidance documents that should be considered when assessing proposals. They also recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation.

Others thought the policy was not strong enough. North Newnham Resident's Association considered the policy did not have a clear enough approach to light pollution, which was a significant problem in Cambridge. Another representor expressed concern that the policy did not reference consideration of indoor air quality. The impact of air pollution in Cambridges narrow streets was

also mentioned, as well as the noise impact from vehicles and heat pumps. It was asked whether more could be done to address noise insulation.

Other comments considered the policy too onerous. It needed to recognise issues covered by other regimes, or some of the matters covered were not necessary, such as indoor lighting. Requiring air quality statements for minor development was not proportionate. Reference to 'sensitive residential premises' was ambiguous and not defined. Some matters could be addressed in the Councils' validation list.

Response to main issues raised in representations:

A number of comments offer support for the policy in general or specific aspects of it, these are noted.

The policy provides a robust policy framework for ensuring appropriate consideration of air quality issues.

Additional clarification has been added to the policy and supporting text regarding consideration of the impacts of light pollution on wildlife. Air quality consideration of environmental impacts is already stated in the policy. There was a request to add reference to soil, but the protection of soils is addressed by other policies. Construction management is also addressed by a separate policy, as is water quality.

The Environment Agency request recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation. National Planning policy (the NPPF) says planning policies and decisions should support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The draft policy does this, but supporting text can be added to highlight the opportunities development can provide for delivering remediation. Reference to technical guidance documents were also added in the supporting text.

Representors questioned why the policy referred to internal lighting, but indoor lighting can still have external impacts on wildlife, so in appropriate circumstances impacts need to be considered. Reference in the consideration of lighting to sensitive residential uses is also an appropriate approach. Some comments question the requirement for submission of Air Quality Statements. Air Quality Statements are a requirement in the adopted Cambridge Local Plan, supported by the Sustainable Design and Construction SPD 2020. They provide a proportionate and effective method of identifying the impacts of a proposal. To enable this, templates have been published appropriate to different scales of development. They are also an appropriate method of identifying where full air quality assessment may be required.

Further guidance sources suggested by the Environment Agency have been added to the policy.

There was a suggestion that requirements could be made through validation lists. While they are a useful tool, it is important requirements are also made in planning policy.

Some comments raise concerns about the strength of the policy in preventing pollution. The policy is considered to provide a robust approach to considering applications. It takes an appropriate approach to taking account of the opportunities for mitigation. Another comment queries the coverage of policies from the adopted Cambridge Local Plan. The lighting policy approach is broadly similar but additional detail is included in the new local plan. The visual pollution policy is now addressed by policies in the Great Places theme. There were queries around the noise requirements, including noise insulation, but the policy is considered to go to the appropriate level of detail.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We are broadly supportive of this policy, most notably those clauses relating to light pollution, which tally well with the aims of Policy S&GS 15: Preserving our dark landscape	201617 (Stapleford PC) 210943 (Great Shelford PC)
Local Plan should include indoor air quality standards. Filtering indoor air and providing sufficient ventilation will reduce harmful PM2.5 pollution and will remove airborne disease causing viruses and bacteria. Guidance should follow the ASHRAE standard, which requires a minimum of 6 air changes per hour. This is extremely hard to retrofit, so should be required in new builds.	202800, 202825 (H Cook)
Objects to Policy WS/HS. The requirement for major development proposals to submit an assessment of the impact of new external and internal lighting, and requirements in part 7 for all major and minor planning applications to submit an Air Quality Statement, are overly prescriptive and unjustified. Contributes unnecessary cost and burden on applicants	203085 (Barratt David Wilson Homes and North West Cambridge consortium)

	204007 (Anglia Ruskin University)
The policy refers to the need for Noise Impact Assessments and Air Quality Assessments where relevant. These requirements should be referenced within the Council's validation requirements instead of being included in the policy.	210250 (Vistry)
Clarification is requested in relation to paragraph 2 of the policy, which refers to "sensitive residential premises". As currently drafted, this term is not defined and introduces unnecessary ambiguity.	210249 (Vistry)
Policy is too extensive and needs to recognise that some of the adverse impacts can be mitigated by suitably worded conditions or via validation checklists. There is also a need to recognise that other regulatory regimes can rectify some of the issues specified. The policy could result in unnecessary cross-over between regimes.	203360 (ESCO Prospect)
Anglian Water supports the policy section regarding environmental nuisance/pollution and the agent of change principle. We consider that this provides a robust approach to managing development proposals for sensitive uses, including residential development, near our water recycling centres or sewer pumping stations, to ensure such proposals do not put at risk the operation of our existing infrastructure, and that the Agent of Change Principle will apply.	210210 (Anglian Water Services)
The proposed policy requires that new developments must not cause significant adverse environmental effects. However, it inadequately addresses pollution, appearing to accept its increase as inevitable and focusing only on mitigation. Light pollution is already a serious issue in Cambridge and should be reduced, not allowed to worsen. The policy relies on subjective judgments about what constitutes "significant" or "unacceptable" impacts, rather than clear evidence. Mitigation should be required for any	205027 (North Newnham Resident's Association)

<p>demonstrable adverse effect. It assumes development should proceed even if it causes pollution, provided mitigation is possible. Yet, some impacts, especially from light pollution, can cause irreversible harm to wildlife and humans. The policy should not be based on the inevitability of increasing pollution, particularly given the negative effects of strong LED lighting. Developments that conflict with sustainability, environmental protection, health, or community objectives should not be permitted.</p>	
<p>The importance of emissions from vehicles involved in development and the potential amplification of these when travelling through narrow, canyon streets should be born in mind.</p>	205194 (D Stoughton)
<p>The draft Local Plan does not seem to include policies equivalent to Local Plan 2018 Policy 34: Light Pollution Control and Policy 65 Visual Pollution. The requirements in these policies should be carried forward</p>	208628 (Madingley Road Residents Association)
<p>Rural active travel routes and PROWs should be bridleway to include horseriders.</p>	204000 (S Rogers)
<p>Should include wording within this Policy about assessing environmental impacts, particularly in relation to Air Pollution. Your authority should follow Natural England's new Air Quality standard advice for guidance on this matter (see Appendix 2).</p> <p>Additionally, the Cambourne GBI document (page 13) refers to a buffer of 100m between Woodlands and Major Roads. Please note however that Habitats Sites and SSSIs (and woodland) at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification. The HRA includes an assessment of air pollution in relation</p>	207633 (Natural England)

<p>to Habitats Sites (using a 200m buffer), but SSSIs should also be assessed by your authority as part of the</p>	
<p>The Light Pollution section of this Policy could also specifically mention the Eversden and Wimpole Wood SAC Impact Risk Zone (IRZ) and have requirements specific to this area, for example to follow the Institute of Lighting Professionals GN08 Bats and Artificial Lighting.</p>	<p>207634 (Natural England)</p>
<p>Make the content on eliminating light pollution - especially from poorly-designed street lighting strong. Strengthen the content on noise pollution especially from motor vehicles and generators - and air source heat pumps. Can provision be made for their sound insulation? Can improved provision on noise pollution and noise insulation in shared buildings and flats be strengthened?</p>	<p>203806 (A Carpen)</p>
<p>In this policy's stated aim, "odour, and/or light pollution" should be amended to "odour, soil, air, water, and/or light pollution" and "suitable for the end use" should be amended to "suitable for both the construction process and the end use." These make the aim more comprehensive. We recommend adding a new criterion 4.e to state "proposed development will not lead to excessive noise and/or vibration pollution during the development process" to address the risk of pollution during the construction process. The section "contaminated land" should be re-titled "contaminated land and water," as 10b discusses impacts on controlled waters.</p>	<p>203708 (Cambridge Green Party)</p>
<p>Health and safety in Girton depends heavily on safe Active Travel, reduced road danger, and flood-resilient environments. Unsafe severance points (Huntingdon Road, NIAB bridge area) undermine health. Flood-risk areas (Washpit, Beck Brooks) pose safety and wellbeing risks. Pollution reduction aligns with better cycling/walking infrastructure. GPC Requests to the Local Plan: Address unsafe</p>	<p>202230 (Girton PC)</p>

junctions and severance points under WS/HS. Embed flood-risk mitigation in health and safety policy expectations. Prioritise active mobility safety measures.	
Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.	210372 (Community Campaigner D Barton)
Public health support Draft Policy WS/HS that seeks to ensure amenity for new buildings and neighbours. Would like to see water pollution and overheating included within this policy.	210608 (Cambridgeshire County Council)
Supports Policy WS/HS. The policy recognises the importance of ensuring that new development does not result in unacceptable impacts on health, amenity or safety arising from pollution, including noise, vibration, odour, light and air emissions.	204453 (Tritax Big Box)
Land south of Coldhams Lane is a very toxic old tip. Multiple piles are planned to be drilled through many metres of waste during construction. This WILL release toxic leachate into the chalk stream BELOW the site (Cherry Hinton brook) and probably will cause leachate also to flow SIDEWAYS into neighbouring land. It will also greatly increase traffic on Coldhams Lane.	201249 (S Williams)
EWR route is the worst route that could possibly have been chosen. It travels too close to local houses, it is insensitive, destructive, scarring, it will create mental stress and anxiety for thousands of local people, the noise pollution will be unbearable and the damage to the countryside and wildlife will be horrific. A new route should be chosen.	201586 (P Brown)
We would recommend greater emphasis and encouragement for the redevelopment of land affected by contamination as this is a sustainable approach which provides an important opportunity for environmental improvement via remediation.	211167 (Environment Agency)

<p>We are pleased to see these included and that Plan highlights the necessity for soil and groundwater investigations and mitigation of any contamination prior to development. Any development proposed on brownfield sites, historic landfill sites, or sites suspected to have been affected by contamination, should follow the requirements of our Land Contamination Risk Management (LCRM) guidance. This would initially require a Preliminary Risk Assessment, which would likely be followed by intrusive site investigation, and potentially detailed quantitative risk assessment to assess whether remediation can be undertaken to ensure the protection of the surface water and groundwater environments.</p>	<p>211168 (Environment Agency)</p>
<p>We recommend that the following guidance be referenced: Paragraphs 123, 146, 180, 189 and 190 within the National Planning Policy Framework (NPPF); Part IIA of the Environmental Protection Act 1990; The Land Contamination Technical Guidance on gov.uk including the Land Contamination Risk Management (LCRM) guidance. Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted.</p>	<p>211169 (Environment Agency)</p>
<p>We question the justification for requiring an Air Quality Statement in respect of all development sites, particularly those that are not within any Air Quality Management Area. We consider it therefore unnecessary for the policy to require planning applicants to also provide an assessment of air quality. Further, a CEMP is a standard condition for new development, and this typically contains information on dust and air quality, including monitoring provisions throughout the construction phase. As such, this policy requirement represents duplication of both air quality assessments within the district and information contained in a CEMP which will add unnecessary burden to applicants.</p>	<p>208359 (T Elbourn)</p>

It is recognised that successful development should take account of sources of pollution.	211546 (Martin Grant Land Limited)
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Policy WS/PH: Public houses

Abbreviations

PC= Parish Council DC= District Council TC= Town Council

Summary of Main Issues:

The policy was supported by Cambridge Past, Present and Future and other individuals. The Cambridge Green Party suggested amendments to allow for more than just one public house to serve a wider range of clientele. One member of the public was concerned that the policy made no specific requirements for new public houses in any large developments and that the caveat of the policy b(iii) is too wide (1000m) which would not protect Cambridge based public houses where they are more concentrated in areas like Mill Road. Girton PC requests the Local Plan: treat pubs as essential social infrastructure; resist their change of use unless equivalent social value is demonstrated; encourage partnerships between pubs and community groups.

Comments made by one member of the public stated there are now too many public houses, those not being used should be closed. Another requested safe inclusive of horse rider routes to/from rural pubs to enable horse riders to support public house business by frequenting them.

Response to main issues raised in representations:

In response to the comments submitted, the policy has been amended to clarify the circumstances where proposals will be supported for new or enhanced public houses, wine bars, and other drinking establishments where food is ancillary to the premises'

use. It should be noted that even when planning permission is granted for a public house or equivalent establishment selling alcohol, both the premises and operator will still need to have a licence to sell alcohol in to operate and the licensing process is separate to planning.

The policy has also been amended to reference a List of Safeguarded Public House Sites (listed in the Appendix J) to clarify the list of public houses including their curtilage that the policy will apply to. The list will be reviewed periodically.

Further clarification about the evidence needed to support the loss of a safeguarded public house has also been provided in the policy along with additional guidance regarding public house viability appraisals (featured in Appendix G). While there is no specific requirement to provide a public house in the area's large development sites, the revised policy provides greater clarity about their provision including other forms of drinking establishments where food is secondary. The broader range of drinking establishments should also provide greater flexibility for such operators to open in new settlements and urban extensions.

Policy WS/NC: Meeting the needs of new and growing Communities had also been amended to include the provision of leisure routes. These would be suitable for people of all ages and abilities and for a variety of uses, to allow them to exercise outdoors and access nature and the wider countryside.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Times have changed. There are now too many public houses. Close them where they are not being used. Move on.	202179 (M MacGinley)

Support the protection of Public Houses.	203372 (Cambridge Past, Present and Future)
The caveat of the policy b(iii) is too wide (1000m) areas of Cambridge would not have the benefit of this policy protection, for example the many existing pubs on Mill Road would not be protected. Greater policy protection wording required to help preserve the pub landscapes within the city.	202502 (H Brown)
So far as I know, you have not required new pubs in any of your large developments.	201250 (S Williams)
Supporting the diversification of public houses to help them remain viable within the Local Plan is essential. Denying permission for change of use will not work unless they can remain financially viable.	202026 (S Williams)
Safe inclusive of horserider routes to/from rural pubs enables horseriders to support pub business by frequenting them.	204003 (S Rogers)
We welcome this policy's recognition of public houses as community infrastructure rather than just commercial assets. However, in point 1, "need for the public house" should be amended to "need or significant demand for the public house." In cases where one public house is available but of a character unsuitable for some residents' usage, there is no community-wide need for an additional public house, but there may be significant demand from those residents who are under- or un-served by the existing provision.	203709 (Cambridge Green Party)
GPC Requests to the Local Plan: Treat pubs as essential social infrastructure, not optional amenities. Resist change-of-use proposals unless equivalent social value is demonstrated. Encourage partnerships between pubs and community groups.	202231 (Girton PC)
It is recognised that public houses are a key element of a successful community.	211547 (Martin Grant Land Limited)

