

# Consultation Statement

## Appendix 11: Response to Representations - Great places



### 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

## Great Places

### Great Places Introduction

#### Abbreviations

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

#### Summary of Main Issues:

General comments on the Great Places theme were made on a wide variety of issues. A large number of comments focused on the importance of culture and investment in cultural venues. Investment in cultural infrastructure should be reflected across the plan and not just in the great places or the wellbeing section, and should be considered alongside other important types of infrastructure.

Cambridgeshire Constabulary requested that Secured by Design Principles be reflected in planning policies, and clearer policies on security and crime prevention. Cambridgeshire Acre highlighted the importance of considering design in rural areas as well as urban forms of development. The Cambridge Green Party highlighted the importance of community engagement and involvement

in decision making. Cambridge Past, Present and Future sought greater clarity on the approach to public art, and clearer policies regarding lighting design. Several comments highlighted the importance of creating walkable neighbourhoods, and the importance of public rights of way. Camcycle made comments and policy suggestions to support active travel, particularly regarding connectivity.

Some questioned whether design quality was being achieved, and whether the policies in this plan would make a difference. It was stated that policies in the plan needed to be followed, and not overridden by speculative development, including infrastructure projects. Others highlighted the importance of development being accompanied by new infrastructure. A number of representations considered that the policies regarding the historic environment were too prescriptive.

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

The general support for policies under this theme is noted.

Cultural infrastructure is an important issue that has informed development of the Local Plan. A number of studies new studies were commissioned, including the Community Infrastructure Study and Cultural Infrastructure Strategy which also inform the Infrastructure Delivery Plan.

The people and place responsive design policy seeks proposals which empower people and communities through community engagement to inform design decisions. Further updates have been made to policies to address community safety and reflect up to date guidance on Counter Terrorism security and prevention measures. Policies in the infrastructure addressing transport and

connectivity seek to deliver walkable and connected neighbourhoods, and set appropriate and robust requirements around active travel. Policies seek to successfully integrate public art in development and the public realm.

The plan has appropriately considered heritage, and provides a robust set of policies, supported by evidence to ensure protection and enhancement of heritage assets.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Recommend that new developments incorporate Secured by Design principles – physical protection, well-defined routes, safe lighting, clear separation of public and private spaces, surveillance and management – as an early-stage design requirement, in line with NPPF 12(135)(f).</p>	<p>201335 (Cambridgeshire Constabulary)</p>
<p>Support Cambridge Junction and Create Cambridge in asking that:</p> <ul style="list-style-type: none"> <li>• Cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing</li> <li>• Culture is treated with parity alongside housing, transport and utilities as core civic infrastructure</li> <li>• Create Cambridge is engaged as advisor/consultee on the further development of the Cultural Infrastructure Strategy and the Local Plan where this relates to cultural infrastructure and embedding Culture across the city’s plans.</li> <li>• This reflects how cultural venues function in practice and ensures consistent delivery across the plan</li> </ul>	<p>202153, 202320, 202898, 202902, (Cambridge Junction), 202402 (J Webber), 202421 (T Shaw), 202694 (T Altmann), 202724 (W Townsend), 202768 204197, 205433</p>

(Cambridge Junction /  
create Cambridge),  
202950 (R Tarry), 202963  
(T Flinders), 203374 (N  
Ellis), 203455 (S  
Ashworth), 203497 (L  
Heap), 203649, 203881,  
205083 (University of  
Cambridge), 203859 (N  
Yeni), 204422 (New  
International Encounter),  
204872 (L Matthews),  
205148 (H Paterson),  
205379 (L Howse),  
205383 (N Oakley),  
205444 (A Seiglow),  
202066 (H Chamberlain)  
202208 (H Tam), 205223  
(J Walsh)

<p>We support these policies.</p>	<p>203040 (Cambridge City Liberal Democrat Group)</p>
<p>We support the Great Places policies GP/PP and GP/QD and recommend each include an explicit reference to Active Design.</p>	<p>209231 (Sport England)</p>
<p>Included in great places consideration must be given to buildings such as Schools and Hospitals. They should all be upgraded or replaced if they are no fit for modern use</p>	<p>202181 (M MacGinley)</p>
<p>The emphasis on high quality design and local character is welcome and relevant to rural areas with sensitive landscapes and heritage. However, the policies appear largely framed around urban form, density and taller buildings, with less guidance tailored to village scale development. Rural vernacular, farmsteads and the setting of small settlements are not clearly referenced. Stronger rural proofing would include clearer expectations for design in working landscapes, protection of village edges and support for reuse of rural buildings, ensuring quality design enhances both heritage and everyday rural life.</p>	<p>203176 (Cambridgeshire ACRE)</p>
<p>The 'Great Places' theme should include more concrete references to involving local people and communities in decision-making, as people are central to creating great places. References to building materials should specifically require that the materials be sustainable. Provisions for enhancing and protecting biodiversity must be strengthened, as research shows that to fully benefit from biodiversity, at least 20% of land area (including urban spaces) must be maintained as semi-natural habitat and urban green spaces are crucial for cooling local temperatures. Finally, we recommend adding a new policy on Tree-lined streets.</p>	<p>203711 (Cambridge Green Party)</p>

<p>It is unclear how the plan will respond to and deliver Public Art. It is currently unclear whether its preservation and implementation fall under the general design quality standards of GP/QP (landscape and public realm) or the protection of Non-Designated Heritage Assets (GP/ND). Without a specific designation, significant public art installations may lack the necessary protections against removal or decay. Irrespective of how the plan will approach public art, it should emphasise the importance of early collaboration on the appropriate siting and integration of public art in the design of greenspace and/or public realm</p>	<p>203917 (Cambridge Past, Present and Future)</p>
<p>The governance of Street Lighting requires further definition within the plan. It is presently uncertain whether lighting standards will be dictated by shopfront guidance or broader design policies like GP/QP. Clear policy language is essential to ensure that lighting schemes are sensitive to the historic character of Cambridge and do not contribute to visual clutter or inappropriate illumination of the heritage environment</p>	<p>203920 (Cambridge Past, Present and Future)</p>
<p>Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. Proposals should demonstrate well-designed security features; well-defined routes, spaces and entrances that provide for convenient movement without compromising security; Safe routes: direct, wide, well lit, without hiding places; Places that are structured so that different uses do not cause conflict; appropriate and non-obtrusive lighting levels; Clear separation between public and private spaces, avoiding public routes next to back gardens; Places that promote a sense of ownership and community; Places where the level of human activity is appropriate to the location reduces the risk of crime; Places that are designed with management and maintenance in mind</p>	<p>204652 (Cambridgeshire Constabulary)</p>

<p>Greater Cambridge also has examples of some truly depressing architecture. Of little boxes of blandness. Is there any way of requesting that some effort is put into the design of new buildings? This does not need to cost a lot. There are examples where modest brick detail is enough to make the building more appealing. There may not be, but I plead anyway.</p>	<p>205201 (B Nicolson),</p>
<p>Most of the are laudable aims but too often developments create high levels of traffic or provides a route that other traffic prefers which cuts off one part of a community from another, thus effectively isolating them. If the walking route to local facilities crosses a high traffic zone this then creates yet another incentive for car use and exacerbates the problem.</p>	<p>205238 (D Stouhgton)</p>
<p>Dense development needs strong walking, cycling and public transport to succeed. Introduce mandatory permeability standards based on site size. Walking and cycling connections should be required, not optional</p>	<p>205242 (J Thomas)</p>
<p>As a Cherry Hinton Resident, it is currently difficult to get an appointment at the local surgery without having to wait at least a couple of weeks and the NHS dentists are full. Even though you have already built houses and flats in Cherry Hinton you have not compensated with additional facilities. Do you have any plans to amend this and to do the same for further developments that are planned in other locations? If not, this place is a great deal of extra pressure on existing surgeries</p>	<p>208618 (R Smith)</p>
<p>Good to make HIAs a formal requirement and important points about social isolation and poorer health outcomes but add community severance issue where high traffic levels/layout impede neighbourliness. Walkers/wheelers don't always feel safe near cyclists and micromobility vehicles/skateboards (?) -</p>	<p>201632 (Cambridge Living Streets)</p>

speed, footway abuse, lack of lights -build in remedies. Add building continuous footways at junctions fostering pedestrian priority/wheeling accessibility/slowing vehicle speeds.	
Rural active travel routes and PROWs should be bridleway to include horseriders.	204008 (S Rogers)
Recent houses at Springfield Village and the flats near Cherry Hinton High Street are aesthetically poor and have ruined the character of the village.	208615, 209169 (R Smith)
There should be a clause allowing for increased scale, density, and form in new developments, enabling them to deviate from existing low-density patterns while maintaining good quality. Policies that mandate car-free streets may lead to negative outcomes, such as rear parking; a balance should be struck to create multi-use streets that accommodate parked cars. Encouraging robust and flexible building designs is positive, but the current approach may overlook the adaptability of various building types, particularly those that are less adaptable. There is a lack of emphasis on material quality in the policies regarding skyline and tall buildings, which should be addressed.	202662 (Mole Architects)
The plan fails to recognise and protect Cambridge's world-heritage significance. The plan does not recognise or manage the conflicts between the proposed growth and Cambridge's finite physical and environmental constraints. Tall-building proposals are presented without visualisations or impact assessments, breaching the required heritage and skyline controls.	206574 (J Preston)
I would like to see consideration for different types of development, such as garden or forest developments, where cars are pushed to the edge of the development in hidden multistories/screened single stories, and access roads are minimised to create semirural villages that one can walk around. I think there is a lack of ambition in terms of providing at least some	208732, 208734, 208736 (Cllr M Morgan)

<p>space for these more radical housing design schemes. I think wherever possible when parking is present, it should be hidden (Look at Great Kneighton as a good example). Proper use of architects should be encouraged within these developments, rather than revision to quantity surveyor. Full service Supermarkets (Such as the Sainsburys in Eddington) are very useful to provide cheaper, more varied food than smaller metro shops.</p>	
<p>Redevelopments are too often causing social exclusion of poorer residents. Measures are needed to improve public consultations. Questions should be open and impartial. North Cambridge Framework, and Cambridge Market examples provided. Social inclusion of communities needs to be far better protected.</p>	<p>204928, 207547, 207548, 207549 (A Copping)</p>
<p>We often see developers rely on government-sponsored NSIP legislation to ensure they can bypass local planning frameworks entirely, presenting residents and businesses with proposals that are poorly designed, poorly evidenced, and that embody none of the vital investment in local host-communities that could bring real, lasting benefits and sustainability, helping them to build greener, happier futures. If Cambridge is serious about shaping its future responsibly, it cannot allow its carefully planned growth strategy to be overridden by speculative, profit-driven proposals that treat surrounding rural areas as expendable or as commodities to be consumed and exploited for their private financial or 'greenwashing' potential. The Greater Cambridge Local Plan must Strengthen policy language to prevent NSIP-scale or speculative developments from undermining local landscape, green infrastructure and wellbeing objectives.</p>	<p>209119 (S Hepworth)</p>
<p>Villages like Weston Colville are not simply buffers to absorb growth pressure from Cambridge or elsewhere and we are not here so that private individuals or corporations can asset strip us for our</p>	<p>209120 (S Hepworth)</p>

<p>proximity to a growing city. We are living communities with deep historical roots, active social networks, local family businesses, farms, valuable wildlife habitats and heritage assets. What we seem to lack though, are any meaningful protections. For the Greater Cambridge Local Plan is to be a meaningful and credible policy document, it must explicitly recognise and protect rural communities beyond the Green Belt as an integral part of Cambridge's setting, identity and future resilience.</p>	
<p>Secure parking for motorbikes and electric bikes is essential; future developments must improve bike-storage safety in workplaces and residential sites.</p>	<p>208010 (Cambridgeshire County Council)</p>
<p>One of Greater Cambridge's greatest attributes for cycling is its ability to connect people to their destinations via green space and alongside water. Routes such as those across commons and along river corridors are not in conflict with nature but instead provide people with a powerful experience of nature everyday.</p> <p>Development should build on this strength, treating cycling as a means of stitching together landscapes, communities and daily life. Two policies should be added to the Local Plan:</p> <p>Policy 1: Active travel design principles</p> <p>Potential draft policy: All development must be designed to support walking and cycling as the default choice for everyday journeys. Proposals will only be supported if they demonstrate compliance with the five active travel design principles.</p> <p>Policy 2: Mandatory permeability</p> <p>Potential draft policy: To ensure directness and convenience for walking and cycling, development proposals must meet minimum permeability standards based on site size. For example:</p>	<p>209081 (Camcycle)</p>

- |   |  |
|---|--|
| <ul style="list-style-type: none"><li>• Developments of up to 50 homes or equivalent floorspace must provide at least two direct outward walking and cycling connections to the surrounding area.</li><li>• Developments of 51 to 100 homes or equivalent floorspace must provide at least three direct outward connections, aligned to different cardinal compass directions.</li><li>• Developments of more than 100 homes or equivalent floorspace must provide direct outward connections in all four cardinal compass directions, unless it can be robustly demonstrated that this is physically impossible.</li></ul> |  |
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## Policy GP/PP: People and place responsive design

### Abbreviations

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

### Summary of Main Issues:

There was general support for a policy addressing place making and design issues.

The Cambridge Green Party consider the policy should be clearer that engagement should help shape developments. They also consider the policy should make responding to climate change a requirement.

The importance of designing for active travel, permeability, and creating walkable communities, and sustainable transport opportunities. Camcycle asked for consideration of safety and the perception of safety, and also to consider the comfort of the end uses of active travel infrastructure. One Comments suggests the policy could be more to make sure places are accessible for all. The British Horse Society consider large scale proposals should include rights of way masterplans.

Anglian Water consider policy should refer to a buildings operation as well as its delivery and maintenance. East England Ambulance Service NHS Trust raised a range of design issues needed to create healthy places.

The plan should recognise that development in villages may not be able to meet all the policy requirements. Girton Parish Council highlighted the importance of design reflecting village context. Stapleford PC and Great Shelford PC highlighted the importance of local design guides, and that they are not sufficiently referenced in the policy.

One comment proposed that Design Codes based on Traditional Vernacular Architecture (TVA) should be utilised in preference to Design Guides. Another comment was concerned about inclusive design appearing optional.

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

The people and place responsive design policy seeks proposals which empower people and communities through community engagement to inform design decisions. The Councils also publish a Statement of Community involvement with further guidance on how to carry out a good consultation. The policy has been strengthened to include reference to participation in early stages of plan making such as through masterplanning and public art to inform and shape design decisions.

The policy is ordered by the core themes of Community, Connectivity, Climate and Character, to reflect the Cambridgeshire Charter for Growth but many elements of the policy are reflected in other chapters of the Plan. The policy sets out how development can improve connectivity and includes reference to maximising active travel and sustainable transport through design principles. Connectivity and public rights of way are also addressed in the infrastructure theme, which sets appropriate policy requirements. It is important to minimise repetition of policies. Climate change issues are addressed within the relevant theme, and should not be duplicated here. Wording has been added to include design of development that has low impact on its operation to respond to the climate emergency.

The policy can be applied proportionally to a range of contexts, including in villages and additional references have been added to reflect on the important rural character that extends into the city and the key opportunities to experience the built and natural environment from these locations. The importance of the various types of design guidance and codes, including village design codes, is recognised in the supporting text to the policy and has been added to policy criteria alongside references to neighbourhood planning. Different types of architecture will be appropriate to different locations, including Traditional Vernacular Architecture.

More detailed requests regarding design of high quality streets, public realm and development are noted, and have been addressed in other design policies within the Great Places Chapter.

Table of representations:

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Design guidance and codes produced by local communities during neighbourhood planning, reflect extensive community engagement, and are important documents. These documents are not adequately referenced in the policy or supporting text, except for a vague mention in paragraph 7.12. Clear references to design guidance and codes should be included in the policy or its supporting text, emphasising their role in influencing development design and ensuring responsiveness to people and place. Whilst clause 4 of Policy GP/QD includes references to design guidance, similar references should be made in Policy GP/PP.</p>	<p>201618 (Stapleford PC)</p>

<p>Where neighbourhood plans have been adopted, local communities have invariably undertaken extensive community engagement to produce at the very least a design guide and, in many instances, a detailed design guidance and codes. No mention of this is made in either the policy or supporting text. Design guidance and codes are invaluable documents with long lifespans which should be a major influence on development design and, by their very nature, already demonstrate people and place responsive design. We request that clear reference is made to them at an appropriate place in either the policy or its supporting text.</p>	<p>210944 (Great Shelford PC)</p>
<p>The Local Plan must incorporate the five active travel design principles – coherent, direct, safe, comfortable and attractive – as a requirement for all development. It must also include mandatory permeability standards requiring multiple direct walking and cycling connections into surrounding areas. Also, the planning stage must include tests of design quality, not (as too often at present) left until later stages.</p>	<p>201997 (D Langley)</p>
<p>Anglian Water is supportive of clause 1.c to ensure new development supports the climate emergency response. We consider it would be useful to include the term 'operation' as new buildings using less energy and potable water are a factor of its operation rather than delivery or maintenance.</p>	<p>210211 (Anglian Water Services)</p>
<p>This policy has an excellent basis, and supports the need for citizens to be able to live in healthy and attractive environments. There is one omission worth noting: 1.b.i/ii mentions connectivity, transport infrastructure, and active travel. Sadly the transport isn't required to be sustainable.</p>	<p>202644 (P Tribble)</p>

<p>We support the aims in this policy particularly aims around connectivity and active travel links.</p>	<p>203042 (Cambridge City Council Liberal Democrat Group)</p>
<p>Policy is aimed at large-scale developments and there should be a recognition that if development is provided in villages that are also communities, it may not be possible to meet the full checklist of information being sought and a proportionate approach should be used.</p>	<p>203369 (ESCO Prospect)</p>
<p>Large-scale development site opportunities may come forward in a piecemeal manner. However, in such circumstances, planning permission should require a comprehensive rights of way masterplan for the whole site to be prepared and agreed at an early stage. This would ensure that the cumulative impact on the public rights of way network is properly addressed and that opportunities to protect, enhance and improve the network are not lost. Securing a site-wide rights of way masterplan as part of the permission, would enable coherent delivery of safe, inclusive multi-user access meeting national and local policies.</p>	<p>203601 (British Horse Society)</p>
<p>In 1.a.iv, “inform design decisions” should be amended to “inform and shape design decisions,” so that community engagement genuinely empowers local people and has a clear influence on outcomes. Without this, engagement risks being tokenistic. In 1.c, we recommend adding a second subclause 1.c.ii, “being designed to be adapted and resilient to the impacts of climate change, including extreme weather events.” This change is necessary to reflect scientific forecasts and ensure development responds effectively to the climate emergency. An effective response needs to go beyond mitigation and extend to adaptation and resilience.</p>	<p>203712 (Cambridge Green Party)</p>

<p>We support the strategic vision of Policy GP/PP, particularly its emphasis on development responding positively to context and maximising active travel through new and improved cycle routes. This focus on connectivity aligns well with the locational advantages of settlements such as Horningsea, which have benefited from recent Greenway investment. By prioritising character, climate, connectivity and community, the policy provides a strong framework to ensure that new housing, including deliverable fringe sites, contributes positively to a lasting legacy of high-quality development.</p>	<p>202070 (M Asplin)</p>
<p>Connectivity without coercion; Good permeability matters — but it should apply to all users, not selectively. Creating routes that: work well for cyclists but poorly for pedestrians; or exclude vehicles regardless of context, creates division rather than connection. Design principles should aim for: safety; legibility; and coexistence.</p>	<p>208878 (D Smith)</p>
<ol style="list-style-type: none"> <li>1. Design Codes based on Traditional Vernacular Architecture (TVA) should be utilised in preference to Design Guides</li> <li>2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.</li> <li>3. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.</li> </ol>	<p>210354 (Community Campaigner D Barton)</p>

<p>EEAST requests:</p> <ul style="list-style-type: none"> <li>• Permeable surfaces that can be used by wheelchairs, mobility scooters, pushchairs, walking aids) and reduce localised flooding.</li> <li>• Lighting designed to reduce crime and improve perceived safety whilst supporting nocturnal habitats.</li> <li>• The needs of adults, children and older people with disabilities but not wheelchair users should also be considered. This might include provision of seating at regular intervals to allow people to sit and rest before continuing with their journey, provide mental health benches and benches at different height levels for children and those who have difficulty lowering/rising.</li> <li>• EEAST would encourage the development of dementia friendly streets, shared space design to promote inclusive access and safety. Street play areas should integrated facilities for disabled children (physical and/or mental health) and be accessible for adults who may be disabled (physical and/or mental health) who are supervising children.</li> <li>• Consideration that not all disabled people are wheelchair users but may still have difficulty negotiating stairs/accessing outdoor or communal spaces.</li> </ul>	<p>210331 (East England Ambulance Service NHS Trust)</p>
<p>I strongly support this policy and encourage its strict implementation. I might suggest going further and adding a point:1.b.iii Whilst encouraging cycling and other forms of active travel, protecting pedestrians from speeding scooters, e-bikes and bikes and ensuring infrastructure that prioritises pedestrians.</p>	<p>204813 (M Cleminson)</p>
<p>The Draft Plan lacks sufficient reference to the transport/place-making needs of those using walking aids or wheeled mobility aids. It should be clear that when the Plan is considering the needs of pedestrians, it is also considering the needs of walking aid/wheelchair users. The term 'wheeling' is now commonly used to mean active travel at pedestrian speed using mobility aids such as wheelchairs,</p>	<p>203994 (S Hughes)</p>

mobility scooters, and rollators. I think it would be much better if the plan referred to 'walking and wheeling' throughout, instead of just 'walking'. A definition of wheeling should be added to the glossary.	
Point 1d is a crucial part of the policy and as it relates to point a., it should be given greater prominence and be renumbered as point b.	203927 (Cambridge Past, present and Future)
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.	202489 (University of Cambridge)
Design in Girton must respond to the historic rural village character, protect the Girton Gap, and reinforce the parish's distinct identity separate from Eddington or urban Cambridge. Place-responsive design must reflect rural scale, green edges, and low building heights.	202232 (Girton PC)
Support the objectives of the policy. In particular, support is given to the emphasis on development responding to local character and distinctiveness. Given the significant variation in character across Greater Cambridge, it is important that the policy is applied in a way that avoids a homogenised approach to design and instead allows proposals to respond appropriately to the specific qualities, scale and identity of their local context. Important that the policy is implemented proportionately through the planning process.	210251 (Vistry Group)
The policy seeks to maximise active travel. It should also seek to make best use of opportunities to enhance countryside access through an expanding network of PROW and permissive access routes for leisure journeys.	210614 (Cambridgeshire County Council)
Rural active travel routes and PROWs should be bridleway to include horseriders.	204010 (S Rogers)
Concerns that inclusive design and accessibility are treated as aspirations rather than enforceable requirements.	208982 (J. Williams)

<p>It is recognised that high quality design is a key element of a successful community.</p>	<p>208271 (Martin Grant Land Limited)</p>
<p>Active travel safety must be understood through two lenses. The first is actual safety. Too many developments prioritise vehicle capacity at site access points, resulting in oversized junctions that encourage excessive motor traffic speeds and form hostile barriers to walking and cycling. Junctions are the biggest risk to cyclists and pedestrians.</p> <p>The second is perceived safety. Lighting remains a major weakness across the network. Important everyday routes remain unlit and solar studs (while a useful guidance solution) are presented as a substitute for lighting when they are not. The barrier this presents in particular to young adults and women is well known and researched but environmental concerns are frequently cited as reasons not to act, yet the environmental cost of journeys not made by bike and instead made by car is rarely acknowledged. Sadly, in Cambridge many locations that are lit and only lit after a serious incident have occurred. We should not have to wait for a horrible assault or a collision before lighting is installed.</p>	<p>209079 (Camcycle)</p>
<p>For active travel infrastructure, comfort continues to be treated as optional rather than essential. Surface quality, width, drainage and maintenance remain points of dispute despite clear national guidance. Poor surfacing and constrained widths disproportionately affect less confident users and those using non-standard cycles, directly undermining inclusive mode shift.</p> <p>Comfort is not about luxury. It is about enabling predictable, smooth and accessible journeys for everyday use, across seasons and user types.</p>	<p>209080 (Camcycle)</p>

## Policy GP/QD: Achieving high quality development

### Abbreviations

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

### Summary of Main Issues:

Representors considered the policy should avoid creation of car dominated environments rather than just the perception. A number of comments requested greater clarity to be added around active travel design, which should be assessed at the planning stage and not left to later detail. Active travel routes should meet the five core design principles. Camcycle consider directness and permeability (the ability to move easily through urban environments) as inseparable.

Cambridge City Council Liberal Democrat Group highlight the policy is missing the letterbox guidance from the 2018 local plan. Cambridge Green Party request further emphasis on the importance of community consultation in shaping places, and a number of other changes including adding reference to sustainable materials.

Anglian water request that the policy require access to existing utilities be considered when designing new development. Cambridge Past, Present and Future that it should consider waste collection, not just storage, and that consideration of impacts should include on the environment and heritage. The East England Ambulance Service NHS Trust highlighted a range of matters for designing healthy places. Comments also highlighted the importance of inclusive design, for both older and younger people. Stapleford Parish Council praised reference to the role of neighbourhood plans in setting design principles, but considered this should also be referenced in other policies. Girton Parish Council considered that design should respond to village context.

Some representors were concerned that quality design was not being delivered, and cited examples. One representor supported the policy in principle, but considered that it should be applied proportionately.

Several comments proposed specific measures that should be applied to the area of the Elizabeth Way Bridge and Underpasses in Cambridge.

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

Active travel is addressed in a number of parts of the plan, but most directly in the infrastructure theme. Concern about creation of car dominated environments is noted, and further clarification around this issue has been added to the policy. Active travel has also been added to the Glossary and makes reference to walking, wheeling and cycling.

Criteria i) has been amended to include reference to the Biodiversity Supplementary Planning Document and the incorporation of design measures to support priority and threatened species such as swift boxes. Requests to amend policy to emphasise the importance of sustainable materials are noted. Criteria i) and o) have been amended to incorporate the climate, nature and biodiversity within high quality design, and this has been set out further in the supporting text and within other policies in the Great Places Chapter and Climate Change Chapter. The ordering of the policy criteria has been amended to separate waste/recycling from cycle parking to distinguish between the design elements and safety, convenience and accessibility.

Designing appropriately to local context is addressed in this policy, with emphasis on responding to high quality design with materials and architectural detailing that are appropriate to the context and character of the area. Changes have been made to emphasise the importance of successfully incorporating legible and safe design into development. Additional requirements have

been added to ensure building layouts, open spaces and active streets provide natural surveillance with appropriate lighting to avoid the creation of blind spots around buildings. Criteria l) has been amended to include waste storage and collection as well as access to utilities and sets out that this must not negatively impact on the environment, heritage and neighbouring amenity. Guidance set out by Secured by Design guidance, and the National Protective Security Authority has been incorporated into the policy with careful design solutions integrated in development through crime prevention features and counter-terrorism protective security measures.

Health and wellbeing have been emphasised in policy amendments with the successful design of buildings, facades, and open space and public realm surrounding buildings playing a key role in improvement mental health. Emerging research in neuro-architecture has been referenced in new policy criteria and the supporting text – setting out how design can have measurable effects on users and passers-by. References to the positioning and accessibility of letterboxes and names and numbering of buildings to increase legibility have been added and reference to permeability of spaces has been added to criteria h). Other elements of inclusive design are required by the People and Place Responsive Design policy. Request for reference to opportunities for safe open spaces and active streets for children and young people is noted and has been included within the landscape and public realm policy within the Great Places chapter. Suicide prevention through high quality design has been added to the skyline and tall buildings policy and establishing high quality landscape and public realm.

The policy provides criteria on achieving high quality development and should be considered in the planning process alongside other policies in the Plan. The policy is also proportionate and sets out how design measures should be implemented.

Table of representations:

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>We support this policy in particular active ground floor uses and frontages to support natural surveillance. However, this is missing the letterbox access guidance from the 2018 City local plan. Please can you add this back in (probably in 2, j) so it is clear that letterboxes should be at an accessible height (in the middle of the door) and that these should be accessible from outside the building for flats, without the need to ring for entry. Please can this also be added to para 7.20 so it includes letter boxes as well as the other services listed.</p>	<p>203044 (Cambridge City Council Liberal Democrat Group)</p>
<p>Section 2.d requires avoiding the perception of a car-dominated environment; perhaps this should rather require avoiding the reality of car-dominated environments rather than just the perception?</p>	<p>203186 (P Tribble)</p>
<p>Is this really required when such information could be sought by a design guide and addressed in a detailed Design and Access Statement?</p>	<p>203376 (ESCO Prospect)</p>
<p>Anglian Water requests that clause 2.i also includes utilities, as it is important that existing utilities are factored into the layout and design of new development. Our existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewerage assets should be sited within highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required</p>	<p>210212 (Anglian Water Services)</p>

<p>The policy and supporting information should be strengthened by referring to waste collection as well as storage, and to environment and heritage as well as neighbouring amenity. Suggested wording for point 2.i. - new text shown in capitals Ensure the layout and design of development successfully incorporates functional needs such as waste storage AND COLLECTION, recycling and bicycle parking, in a way that does not negatively impact on THE ENVIRONMENT, HERITAGE or neighbouring amenity. The policy must be backed by a clear commitment to refuse applications that do not meet the highest possible standards of architectural integrity.</p>	<p>203946 (Cambridge Past, Present and Future)</p>
<p>The overview should replace “designed with communities in mind” with “designed to reflect the needs and priorities of communities, as determined through robust consultation processes” to ensure meaningful engagement. In 2.c, “highquality building materials” should read “high-quality, sustainable building materials.” Section 2.d should prioritise safe, active streets, minimise car use, and integrate parking. 2.i should separate waste/recycling from parking, ensuring both are safe, convenient, and non-intrusive. 2.k should be moved earlier and read “Prioritise mixed-use proposals.” Supporting text should address climate, nature, and biodiversity, and circulation should avoid cul-de-sacs to improve safety and connectivity.</p>	<p>203713 (Cambridge Green Party)</p>
<p>Vistry support the vision of the proposed policy. However, Vistry wish to reiterate the point made in response to Policy GP/PP that it is important the policy is applied proportionately, with detailed matters assessed at the reserved matters stage and clear design principles established at outline planning application stage where appropriate</p>	<p>204866 (Vistry Group)</p>
<ul style="list-style-type: none"> <li>The quality of the design of these needs to be tested early on at the planning stage, not later on when 'spades' are in the ground.</li> </ul>	<p>205047 (B Nicolson)</p>

<ul style="list-style-type: none"> <li>• Getting this right is key to encouraging people to adopt sustainable methods of transport and meeting any climate targets.</li> </ul>	
<ul style="list-style-type: none"> <li>• Developments often feature indirect, unsafe, uncomfortable, or fragmented routes due to the lack of mandatory design quality requirements, making future corrections difficult.</li> <li>• The Local Plan should incorporate the five active travel design principles – coherent, direct, safe, comfortable, and attractive – as mandatory policy tests for all developments.</li> <li>• Mandatory permeability standards should be introduced based on site size, requiring multiple direct walking and cycling connections to surrounding areas to avoid car dependency.</li> <li>• Best practices from proven approaches in places like the Netherlands should be adopted in local policies to enhance active travel.</li> <li>• Design quality should be assessed at the planning stage and considered throughout the entire development process, from initial vision to construction completion.</li> </ul>	205285 (R De Beaux)
<p>This policy must ensure that active travel routes meet the five core design principles – coherent, direct, safe, comfortable and attractive – as a clear policy test for all development. It should also introduce mandatory permeability standards based on site size, requiring multiple direct walking and cycling connections into surrounding areas. Design quality should be tested at the planning stage, not left to later detail.</p>	205358 (A Williams)
<p>Design quality should be tested at the planning stage, not left to later detail.</p>	205675 (S Nuttall)
<p>Transport considerations are a key component to the design process and if not included (and reviewed) at an outline stage it is often impossible to find suitable solutions later.</p> <p>I would like to support the submission provided by CamCycle (the Cambridge Cycling Campaign), in particular: Policy must ensure active travel routes must meet the five core design principles; Design quality should be tested at the planning stage, not left to later detail</p>	204936 (A Brown)

<p>Clause 4 – we are very pleased to see reference to the role of neighbourhood plans in setting design principles. We request that a similarly explicit reference is also incorporated into Policy GP/PP: People and place responsive design.</p>	<p>201619 (Stapleford PC), 210945 (Great Shelford PC)</p>
<p>The public celebrate good design but there are grey over-tall rectangular blocks proposed currently for prominent sites, Kett House replacement Station Road, and the Histon Road/Castle Street corner. Will these be "appreciated by future generations" ? Poor external design adversely affects people's mental health and wellbeing. If built they could feature in Hideous Cambridge 2nd ed. Main routes and junctions should have statement buildings, not dull ones.</p> <p>And the power and influence of the Colleges and other bodies (Railpen) have over planning decisions is worrying. They are so powerful and influential they seem to ride roughshod over all rules.</p>	<p>201783 (H Jackson)</p>
<p>I would like to see explicit inclusion of children - including teenagers - and their needs within this policy. Landscaping can include opportunities for imaginative place and natural play equipment. Safe open spaces and active streets should include formal play equipment for younger children and social spaces for teenagers. Safe locations where they are not chased off for being a nuisance. I think this is extremely important as this demographic are completing consultations or commenting on planning applications.</p>	<p>201830 (T McKeown)</p>
<p>Active travel needs designing into developments at an early stage. Too many developments are designed round a single major road junction, with no other accesses for other modes. Developments need to be permeable to walking and cycling, with access to the development in multiple locations. This enables day-to-day trips by these sustainable modes. This would allow the developments design to best meet the Local Plans overall sustainability goals.</p>	<p>201832 (T McKeown)</p>

Do what Cambourne did.	204013 (S Rogers)
The Local Plan must make active travel a real priority: all development should meet the five design principles - coherent, direct, safe, comfortable, attractive - and include mandatory permeability standards. Sites should have multiple direct walking and cycling connections to surrounding areas. Without this, cul-de-sacs and single-access layouts will continue to trap families in adult-dependent or even car-dependent routines for decades, limiting children's freedom and independence and keeping limiting the time parents have to work, cook/clean and invest in community.	204690 (R Humphrey)
The plan must require designing walking and cycling as the main form of transportation for new developments. To achieve that, active travel routes need to meet the five core design principles set out by Active Travel England's national guidance and standards: routes should be (1) coherent, (2) direct, (3) safe (both actual and perceived), (4) comfortable and (5) attractive. Without these the percentage of trips done by people via active travel will be a fraction of what it could be.	203675 (T Preud'homme)
Policy must ensure active travel routes must meet the five core design principles Design quality should be tested at the planning stage, not left to later detail	204540 (D Potts), 202859 (J Williams), 204576 (R Hoadley), 202292 (R MacDonald), 205047 (B Nicolson), 205429 (P Colledge), 205355 (S Nuttall), 205144 (J Grantham), 201704 (M Hickford), 203306 (A Hoare),

	202875 (J Williams), 203333 (S Hughes)
<p>High quality new development should replicate successful sustainable developments like Eddington. Policy must ensure active travel routes must meet the five core design principles – coherent, direct, safe, comfortable and attractive</p> <p>Design quality should be tested at the planning stage, not left to later detail</p> <p>Following these principles not only makes the development better for those who live there it also enhances the value for the developer in the long term.</p>	202875 (J Williams)
<p>The Local Plan should embed the five active travel design principles (for infrastructure for walking/wheeling and cycling) – coherent, direct, safe, comfortable and attractive – from Active Travel England's national guidance and standards as a clear policy test for all development. The ability for a site to support these principles should be a prerequisite to it going ahead, not a later add-on if it is feasible.</p>	203333 (S Hughes)
<ul style="list-style-type: none"> <li>• More emphasis needed on active transport / design for people not cars</li> <li>• Require active travel routes to be coherent, direct, safe, comfortable, attractive</li> <li>• Mandatory permeability requirement as per LTN 1/20</li> <li>• Test quality requirements met at design stage, not later</li> </ul>	202596 (A Lawrence)
<p>High-quality development means context-sensitive, community-friendly design that protects green space, fits rural morphology, and contributes positively to village life. High quality = appropriate scale, low massing, high environmental standards. Protect the Girton Gap and avoid over-intensification.</p>	202233 (Girton PC)

<p>Community-scale enterprises and buildings preferred over large centres. GPC Requests to the Local Plan: Set quality expectations that prevent over-intensification. Require green-infrastructure integration and rural-fit design. Ensure all development refers to Girton NP design principles.</p>	
<p>Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.</p>	<p>210367 (Community Campaigner D Barton)</p>
<p>Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value. Building Form shouldn’t permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location. Façade Design mustn’t be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.</p>	<p>210370 (Community Campaigner D Barton)</p>
<p>Supports the proposals as quality design which builds in nature conservation helps the physical and health and well-being of residents eg interesting and varied roof lines, mental health benches, places for those with mobility issues to rest and enjoy the views (both blue and green). Include as part of residential and commercial design places for nature to be incorporated into the buildings (eg Swift nesting boxes), fencing (eg hedgehog shelters/gaps, planted living walls instead of fencing). All of these help residents to enjoy nature and provide nature corridors. Scooter/mobility scooter parking also needs to be included (and not just in care homes/specialist housing) with safe charging options to prevent the potential risk for fires. Similar issues should be considered for electric wheelchairs which are used indoors and provision of charging facilities. Ensure sufficient parking spaces/road width and design to</p>	<p>210326 (East England Ambulance Service NHS Trust)</p>

<p>enable emergency vehicles to pass safely without delaying attendance on a call. Similar issues exist for refuse lorries.</p>	
<p>Design of bridges should consider the use of curved walls to increase safety and reduce the ability of death by suicide. Underpasses should be well lit and feel safe for uses at all times of day and night. Use of bright colours and designs can also improve mental and physical health.</p>	<p>210343 (East of England Ambulance Service NHS Trust)</p>
<p>The Local Plan should embed the active travel design principles of coherent, direct, safe, comfortable and attractive, as a policy test for all development. This design quality should be tested at the planning stage. The plan should also introduce mandatory permeability standards based on site size, requiring multiple direct walking and cycling connections into surrounding areas, to shops and amenities.</p>	<p>204088 (K ap Garth)</p>
<p>While the Local Plan places appropriate emphasis on healthy ageing, accessibility, and inclusive design, there is no specific reference to neurodiversity or sensory inclusive design principles. Neurodivergent people, including those with autism, ADHD, learning disabilities, and sensory processing differences, may experience barriers in the built environment such as noise, visual clutter, poor legibility or unpredictability. Therefore, it is recommended to include incorporating sensory-inclusive principles into policies and design principles, such as clear layouts, controlled lighting, reduced overstimulation, and quiet spaces. These measures would create healthier, more inclusive environments for neurodivergent people, older adults, and others with cognitive or sensory impairments.</p>	<p>210636 (Transport 2000 Cambs &amp; W Suffolk)</p>
<p>Supports Policy GP/QD and its overarching objectives, particularly creation of walkable neighbourhoods that align well with the design principles underpinning the approved Bourn Airfield masterplan. The</p>	<p>208985 (Barratt Homes Northampton)</p>

<p>principles set out in Policy GP/QD provide a helpful and flexible framework that complements the ongoing Reserved Matters work at Bourn Airfield. In particular, the policy allows for a context-led approach that recognises the site's unique characteristics, masterplan vision, and locally distinctive design aspirations.</p>	
<p>Support the vision of the proposed policy. However, Vistry and The Quay Estate wish to reiterate the point made in response to Policy GP/PP that it is important the policy is applied proportionately, with detailed matters assessed at the reserved matters stage and clear design principles established at outline planning application stage where appropriate</p>	210252 (Vistry Group)
<p>Support the policy which encourages good design as a key aspect of sustainable development and has the potential to maintain and enhance existing environments, alongside bringing benefits in terms of the health and wellbeing of students and staff of the University as well as residents of Cambridge.</p>	202491 (M Parsons)
<p>Early layout decisions fragment new build areas. The Local Plan should embed the five active travel design principles – coherent, direct, safe, comfortable and attractive – as a clear policy test for all development.</p>	201814 (J Baumberg)
<p>point 2d is not enough to safe guard and ensure high quality walking and cycling routes. Plans should be required to show that active travel routes are designed in at the outset, that are:- coherent- direct- safe- comfortable – attractive. Mandatory requirements should be set for permeability of sites, preventing cul de sac developments that do not allow convenient walking and cycling routes.</p>	201736 (B Brierton)
<p>Chair and Vice-chair of Environment and Green Economy Committee Designing streets, towns, and cities with properly secure parking facilities is essential if we are serious about supporting alternative modes of transport. For example, motorbike parking in Cambridge city</p>	211011 (Cambridgeshire County Council)

<p>centre does not allow riders to secure their vehicles to a fixed anchor, such as a rail or ground-embedded locking ring. As people are increasingly encouraged to travel longer distances by electric bike, greater attention must be given to improving the safety and security of bike storage—particularly in workplaces and residential developments.</p>	
<p>Future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.</p>	211239 (Living Housing Space)
<p>Coherence remains one of the most consistent shortcomings in recent development. Routes may exist in theory, but are broken, diluted or overridden by other priorities on the ground. Two case studies have been presented in the accompanying attachments where this shortcoming is clear and apparent. We have to learn that public space and cycling work together, but segregation is required.</p>	209077 (Camcycle)
<p>Directness and permeability (the ability to move easily through urban environments) are inseparable. Direct routes only exist where layouts are permeable, and permeability is the structural condition that allows walking and cycling to be convenient. Across Greater Cambridge, walking and cycling routes are routinely diverted, interrupted or deprioritised, when motor traffic circulation is prioritised or due to unfounded safety concerns. The cumulative effect of these small decisions is profound. Each detour, signal delay or loss of priority reduces the usefulness of the network and discourages everyday trips by foot or by cycle.</p> <p>In places where cycling works well internationally, very high levels of convenience are achieved not through speed, but through directness and continuity. Minimal stopping, few barriers and consistent priority allow people to cover distance comfortably and predictably.</p>	209078 (Camcycle)

Hayfield agrees that future development should be of quality design and should contribute and respond to the local character of the surrounding settlement.	211464 (Hayfield Homes Construction Ltd)
It is recognised that high quality design is a key element of a successful community.	211548 (Martin Grant Land Limited)

## Policy GP/HD: Housing density

### Abbreviations

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

### Summary of Main Issues:

Some comments offered support for the policy approach suggested in the Draft Local Plan. Higher density housing was supported in central and adjoining Cambridge where areas are well connected, and it can create high quality mixed use walkable neighbourhoods. Higher densities should come with open spaces.

A number of comments provide detailed feedback on the relationship between higher density development, lower car ownership and parking and the need for high quality active travel provision. The opportunities provided by sustainable travel and reduced car parking were highlighted. The need for high quality cycle storage was also raised.

Some comments highlighted that appropriate densities would need to be applied for land released from the Green Belt adjacent to existing developments. Girton Parish council said density should be context led. Historic England welcomed the reference to a context led approach and also the reference to heritage assets. Cambridge Green Party highlighted the importance of considering local context and the needs and priorities of existing communities. They also raised that sustainable water supply must be available.

Some representors highlighted the importance of applying the policy flexibly, including that densities should not be unduly constrained. There was concern references to heritage repeated other policies. Some representors proposed that minimum densities should be set in line with national planning policy.

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

Comments supporting the approach to the policy, and encouraging higher densities in appropriate locations, are noted. The policy seeks to respond to local circumstances but also achieve higher density in sustainable locations.

Some comments say the policy is overly focused on reflecting local character which is not consistent with the NPPF. The policy has been clarified so that site potential is optimised whilst being responsive to surrounding local character and contexts. This is considered consistent with national policy. Within the policy, there is an in-principle support for higher density development in appropriate locations subject to proposals demonstrating they can address the criteria in the policy. Reference to heritage within the policy has also been maintained, given the significance of heritage issues in the area they will be a key consideration when considering density.

Some comments suggested adding minimum densities for specific locations/areas to provide certainty at the development appraisal and application process. Consideration was given to setting specific minimum densities within Cambridge at transport nodes and other sustainable locations, however, these areas were also in close proximity to heritage assets including the historic core, where bespoke site design is needed to optimise sites which respond to the local context. Setting a minimum density would not be appropriate, or as a precautionary measure in order to respond to all sites it would need to be set so low as to undermine its

effectiveness. In addition, considering NPPF (2024) paragraph 130, the requirements where plans have not identified land to meet identified development needs do not apply in Greater Cambridge.

This policy, along with Policy I/EV Parking and Electric Vehicles, respond to opportunities to reduce parking whether alternative to the car are available. Additional reference to this has been added to the proposed submission policy to emphasise this. Comments also highlighted the need for higher density development to come with high quality cycling facilities. Policy I/EV Parking and Electric Vehicles requires this.

The policy should also be read alongside those in the Biodiversity and Greenspace theme, which set standards for open space and biodiversity which will ensure these issues are effectively addressed.

The policy has been amended to include further details on the approach to density on the edge of settlement.

**Table of representations:**

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
General support for the policy	202078 (M Asplin), 203094 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners), 203527

	(Cambridge Ahead), 208341 (Thakeham Homes Ltd), 210502 (Barratt Homes Northampton)
<p>Land Release and Green Belt Concern:</p> <ul style="list-style-type: none"> <li>• Appropriate building densities are required for land released from greenbelt adjacent to existing developments, ensuring they reflect the surrounding area and present a soft edge of the surrounding landscape.</li> <li>• Creating a soft edge to the landscape should involve not only planting but also incorporating gaps and longer sightlines between buildings, which may lead to a necessary reduction in building density</li> </ul>	201620 (Stapleford PC)
<p>We welcome the reference to a context led approach and also the reference to heritage assets. Reference should also be made to gentle densification.</p>	210172 (Historic England)
<p>The relationship between higher density development, lower car ownership and parking and the need for high quality active travel provision:</p> <ul style="list-style-type: none"> <li>• High density housing both enables and requires low car ownership. The Plan should explicitly link these two. It is important to break the "one car per household" assumption made by many developments.</li> <li>• Parking uses scarce land area and drives up costs; and often dominates estate layout and amenability.</li> </ul>	202284 (A Lawrence), 202290 (R MacDonald), 203072 (S Hughes), 203204 (G Orwell), 203669 (T Preud'homme), 204877 (A Brown), 204924 (K Brightwell), 205281 (S

<ul style="list-style-type: none"> <li>• Higher-density development should include strong alternatives to driving to support sustainable travel. Current dense schemes in Greater Cambridge often include high levels of private parking, which consumes land and undermines walking and cycling.</li> <li>• High private parking levels increase housing costs, forcing non-car-owning households to subsidise parking through higher prices.</li> <li>• Dense housing estates without this are either dominated by car parks and/or result in large numbers of cars parked on pavements/in cycle lanes/in public space.</li> <li>• Higher density development should include high quality walking/cycling/public transport network in order to succeed.</li> <li>• Central Cambridge developments should be car free</li> </ul>	<p>Nuttall), 202507 (H Brown), 202856 (J Williams), 203301 (A Hoare), 203715 (A Hofer), 203728 (D Peters), 203884 (J Prince), 204077 (K ap Garth), 204368 (F Sanchez Garcia), 204512 (D Potts), 204568 (R Hoadley), 204651 (M Fordham), 204666 (R Humphrey), 205126 (J Grantham), 205304 (A Williams), 205350 (P Colledge), 203666 (V Ashton), 201813 (J Baumberg), 201827 (T McKeown), 209071 (Camcycle)</p>
<p>High density is a great opportunity to encourage cycling and other forms of wheeling, but must come with really good quality storage/parking that is convenient, secure and feels safe to use day and night.</p>	<p>205281 (S Nuttall), 205350 (P Colledge)</p>

<p>Development density is a key factor in delivering community scale rainwater reuse schemes. The report Water reuse in new housing: Understanding the business case published on the EWSC website identifies the benefits of examining in greater detail the relationship between development density and the respective cost of community versus on-plot installations, due to the significance of external pipework costs as a component of the total cost within community systems. Community scale systems yield cost savings over on-plot reuse above densities of around 60 units/ha - concluding that it is density, not size of development which is the deciding factor.</p>	<p>210213 (Anglia Water Services)</p>
<p>Support for higher housing density:</p> <ul style="list-style-type: none"> <li>• Support the policy that supports higher density development central and adjoining Cambridge as well as areas that are well connected by high quality infrastructure and active travel options.</li> <li>• Higher density development should be actively encouraged, and encouraged everywhere, as it minimises use of precious land resource while creating more walkable environments, enhances the viability of local businesses by having a larger population within a fixed distance, and frees up land for public amenities</li> <li>• Mixed-use developments are essential to provide necessary facilities, reducing the need for car travel.</li> </ul>	<p>202492 (University of Cambridge), 202640 (P Tribble), 204775 (R De Beaux)</p>
<p>Development should take into account of the needs and priorities of existing local communities to ensure development responds to local context</p>	<p>203716 (Cambridge Green Party)</p>
<p>Increased density can create a critical mass of people that fosters a sense of place, supports community uses, services and facilities:</p>	<p>203094 (Barratt David Wilson Homes and the North</p>

<p>High density development at Darwin Green would efficiently utilise land in a sustainable location, enabling residents to live near their workplaces.</p>	<p>West Cambridge Consortium of Landowners)</p>
<p>The policy should be applied with sufficient flexibility, recognising that prevailing local densities are not always an appropriate to the location, particularly where sites are well located or benefit from strong accessibility. In such circumstances, higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form that may no longer reflect the most efficient or appropriate use of land.</p>	<p>204869 (Vistry Group)</p>
<p>Policy proposals for tree canopy and biodiversity should be mandatory, not subject to developer modification. Increased open space requirements should be established for high density developments that lack gardens whilst additional open space requirements should be considered in areas adjacent to existing high density developments.</p>	<p>204877 (A Brown)</p>
<p>Negotiations on land price should occur if economic feasibility cannot be demonstrated, rather than relaxing planning requirements.</p>	<p>204877 (A Brown)</p>
<p>Prevailing character and context:</p> <ul style="list-style-type: none"> <li>• The design-led approach in the policy is overall supported but it is unduly constrained to densities ‘that reflect local character and context....’ This is not the approach that the NPPF takes, which acknowledges that densities should “take into account... the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change.”</li> <li>• Allow greater flexibility in density on small sites where this reflects local character and efficient land use.</li> </ul>	<p>208612 (Pigeon Land &amp; LIH), 202078 (M Asplin)</p>

<p>Heritage considerations:</p> <ul style="list-style-type: none"> <li>Part (c) of the policy should be removed. It is essentially repeating the heritage tests that are already put in place by draft Policy GP/HE and through the balancing exercises set out in Chapter 16 of the NPPF. Those balancing exercises in turn recognise that there may be some impact to heritage assets arising from new development to heritage assets and their settings, but that nonetheless those harms can be found to be acceptable if sufficiently outweighed by the public benefits the development would deliver. That is a more nuanced exercise than set out in Policy GP/HD, which does therefore not need to repeat the point in a more constricted way</li> <li>The policy requires greater flexibility to enable higher density development to come forward without being constrained by existing context and heritage considerations.</li> </ul>	<p>208612 (Pigeon Land &amp; LIH), 203527 (Cambridge Ahead)</p>
<p>The policy should align with the draft NPPF and provide a minimum density similar to 40-50 dwellings per hectare.</p>	<p>201711 (K Mak), 208341 (Thakeham Homes Ltd)</p>
<p>Density should be context and infrastructure led in rural villages and intensification should be avoided.</p>	<p>202234 (Girton PC)</p>
<p>Higher density development does not necessitate high-rise residential development, as demonstrated through a range of housing typologies</p>	<p>203973 (Cambridge Past, Present and Future)</p>
<p>An additional requirement should be added that proposals must demonstrate that water can be adequately and sustainably sourced given the region's water scarcity and to ensure development is environmentally sustainable</p>	<p>203716 (Cambridge Green Party)</p>
<p>High density housing tends to be Leasehold but should be Share of Freehold</p>	<p>202567 (A Lawrence)</p>
<p>Support the overall principles of the policy. Although, Vistry and The Quay Estate consider that the policy should be applied with sufficient flexibility, recognising that prevailing local densities are not always</p>	<p>210253 (Vistry Group)</p>

<p>appropriate to the location, particularly where sites are well located or benefit from strong accessibility. In such circumstances, higher densities may be both suitable and sustainable and should be assessed on their individual merits rather than constrained by surrounding built form that may no longer reflect the most efficient or appropriate use of land.</p>	
<p>There is enormous tension between the NPPF's requirement for local plan policies to make efficient use of land versus clauses b and c of this policy. In the absence of further evidence for the policy (as noted in para 7.27), it is difficult to comment on its merits or otherwise. This is unfortunate given how significant this policy will be in determining future planning applications in Greater Cambridge.</p>	210946 (Great Shelford PC)
<p>When considering how density should be applied in different locations, it is vital that explicit consideration is given to appropriate building densities for land released from Green Belt which is adjacent to an existing development framework. Such densities should reference density in the immediate surroundings but also present a soft edge to the surrounding landscape. A soft edge is created not just through planting but by gaps and longer sightlines between buildings, which will inevitably – and appropriately – reduce building density.</p>	210947 (Great Shelford PC)
<p>Supports the Council's view that for housing density to be appropriate it should reflect the local character and context. Making the efficient use of land through increasing densities is an existing national planning policy requirement. The emerging Local Plan should align with national policy in order to assist Greater Cambridgeshire in meeting their housing requirement.</p> <p>Terra note that no density figures have been provided within the draft policy. Whilst it is acknowledged that character and local context should inform appropriate density levels, the absence of any minimum figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of</p>	211222, 211266 (Terra Strategic), 211240 (Living Space Housing)

<p>broad density guidance as part of the policy's design-led and context-led approach, would improve consistency in decision-making, ensure that sites come forward with proposals which make efficient use of land in line with national planning policy. Therefore, it is recommended that draft Policy GP/HD is amended to include indicative density ranges that provide clarity for developers and decision-makers</p>	
<p>MGL welcomes the approach to defining appropriate density, and avoiding undue prescriptive requirements.</p>	208260 (Martin Grant Land Limited)
<p>EWR Co welcomes the draft Local Plan's focus on ensuring that land is used effectively when being developed, as set out in draft Policy GP/HD. In line with this draft policy, EWR Co would support maximising densities around stations which will be served by EWR at Cambourne, Cambridge South, Cambridge, and Cambridge East, as development in these areas would benefit from being in highly sustainable locations.</p>	211889 (East West Rail Company)
<p>Hayfield supports the Council's decision for housing density to be appropriate in order to reflect the local character and context.</p> <p>However, Hayfield note that no density figures have been provided. Whilst it is acknowledged and supported that character and local context should inform appropriate density levels, the absence of any benchmark figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance, alongside the policy's design-led and context-led approach, would improve consistency in decision making and provide greater certainty for delivery.</p> <p>Therefore, it is recommended that Policy GP/HD be altered to include indicative density ranges that</p>	211465 (Hayfield Homes Construction Ltd)

<p>provide clarity for developers and decision-makers. While a design-led approach is welcomed, clear benchmarks would support early feasibility work, improve consistency across decisions, and reduce uncertainty at pre-application and application stages.</p>	
<p>Note that no density figures have been provided within the draft policy. Whilst it is acknowledged that character and local context should inform appropriate density levels, the absence of any minimum figures creates uncertainty at the early planning, feasibility and land valuation stages. The inclusion of broad density guidance as part of the policy's design-led and context-led approach, would improve consistency in decision-making, ensure that sites come forward with proposals which make efficient use of land in line with national planning policy.</p> <p>Therefore, it is recommended that draft Policy GP/HD is amended to include indicative density ranges that provide clarity for developers and decision-makers.</p>	211587 (Terra Strategic)

## Policy GP/ST: Skyline and tall buildings

### Abbreviations

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

### Summary of Main Issues:

A number of comments expressed support for the policy. This includes Historic England, who advised they were keen to support growth in appropriate locations whilst protecting and enhancing what is important in relation to the skyline of the City and surrounding area. They welcomed the detailed work that had informed the policy. They consider that policy currently underplays the semi-rural nature of parts of Cambridge and the surrounding area, development should be seen as an opportunity to enhance Conservations Areas and the skyline of the city in general, and it will be important that increases in height do not affect our experience and perception of coalescence between the city and surrounding villages.

There were comments that raised concerns that the policy wording is actively promoting tall buildings in the Cambridge and the surrounding district and that there is a reliance on site-by-site assessment. Further comments raised concern that tall buildings are not appropriate in historic and rural settings.

Elements should be strengthened including in point e that reference to daylight should be more than 'adequate', and the reference to microclimate was too weak. It was also suggested that glare should be added as a consideration. FECRA suggested mandatory protection for domestic-scale building heights. Cambridge Past Present and Future were concerned the policy could create monotonous roofscape, and were also concerned about the identification of four areas as being suitable for tall buildings.

Some comments sited concerns over the height of recently constructed buildings and gave examples. Others considered opportunities to restore skylines and replace carbon poor glass towers should be encouraged. Girton Parish Council highlighted the importance of the skyline to their village, and that sensitive skyline should be protected. Visual impact assessment should be required.

Some sought greater flexibility, that tall buildings may be acceptable on a site by suite basis. If the policy is operated to strongly it could hold back density and aspirations for growth. It was questioned where the policy was consistent with national planning policy. There was concern whether the policy was overly focused on developments breaking the skyline, and also how the policy applied to villages. There was concern whether it would constrain uses that need height, such as logistics. Others thought the policy would give developers too much freedom, and development must fit in with the local skyline and landscape character for sites on the edge of and beyond Cambridge.

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

The policy, supported by Appendix I which forms part of the Local Plan, and the Skyline and Tall building study, are considered an appropriate framework for considering proposals.

The policy allows consideration of any tall building proposal on any site (including brownfield sites within and on the edge of the City) and provides a comprehensive set of criteria supported by Appendix I to help in the assessment of any tall building proposal. This provides flexibility whilst also ensuring that development proposals are appropriate in terms of their height, massing, scale and any local and/or strategic impacts are carefully considered and mitigated. The wording says 'no adverse impact' rather than no

impact. For example, BRE Daylight and Sunlight assessment seeks to ensure that proposals result in adequate daylighting. Schemes that have an adverse impact that overrides all other considerations, would need to be considered in terms of planning balance. The policy maintains the word 'must' in point e because the degree of assessment can be tailored to the complexity of the scheme and circumstances but these matters will require assessment as part of scheme design.

The opening wording has been amended to avoid any perception that the policy establishes a general presumption in favour of taller buildings. The revised wording makes clear that the policy is concerned with the assessment and management of development proposals that would materially affect the skyline and that such proposals will only be supported where they satisfy the policy criteria. The amendment retains a positive approach by clearly identifying the circumstances in which proposals will be supported, while better reflecting the policy's primary purpose of managing change to the distinctive skyline and character of Cambridge and the surrounding district. This recognises that the historic skyline of Cambridge is a defining characteristic of the area and that proposals which respond positively to their context and make a positive contribution to the skyline may be acceptable where they satisfy the policy criteria. Whilst it is agreed that Cambridge is emerging into a polycentric city, the design, massing and height of new proposals on these edge of city sites still require careful consideration, both individually and cumulatively and therefore the policy seeks to ensure a balance can be achieved; the delivery of high quality, context led development and the careful consideration on the city's skyline, heritage and landscape assets. The definition of tall buildings has been retained within the opening of the policy, with the wording refined to improve clarity and readability.

The purpose of a policy is not to justify why there should be harm but rather set out a framework for the consistent assessment of tall building proposals and skyline impact. Part b) of Policy GP/ST specifically identifies the need to assess impact on the historic environment and the need to 'assess and quantify the potential harm of proposals to the significance of heritage assets'. It specifically identifies Cambridge in part b) and the need to 'ensure that the character and appearance of a city of spires and towers

emerging above an established treeline remains dominant from relevant viewpoints.’ It specifically identifies Cambridge in part b) and the need to ‘ensure that the character and appearance of a city of spires and towers emerging above an established treeline remains dominant from relevant viewpoints.’

Appendix I provides an overall approach to the assessment and justification of proposals that include tall buildings and therefore have the potential to impact on the skyline. The use of Appendix I and the criteria in Policy GP/ST and other related policies, is part of the approach of providing the clear justification for development proposals.

The policy provides a comprehensive and clear set of criteria to assess the likely impacts of tall building proposals in relation to the skyline and more locally, to ensure that proposals are appropriate to their context and deliver high quality design. Comments relating to masterplan level considerations and robust landscape and townscape principles would form part of such an approach and particularly when considering cumulative impact and concerns about coalescence.

A masterplan to identify and locate tall buildings would be impractical for an area the size of Greater Cambridge. Furthermore, the policy is not actively promoting tall buildings within the Greater Cambridge area. Instead, it recognises that pressure for growth may result in taller buildings, many of which will be located in Areas of Major Change but also have the potential to be proposed on a more ad-hoc basis. Therefore, the establishment of assessment criteria supported by Appendix I is considered the most appropriate way to assess and ensure that any tall building proposal (defined by the context heights thresholds) responds positively to local and wider contexts and maintains the character and quality of the skyline. Requirement relating to the expected quality of landscape and townscape are captured in other proposed policies.

Matters relating to coalescence are covered through part c) which requires assessment of the cumulative impact at both strategic and local levels.

New development, including that which is at a higher density (Covered in Policy GP/HD Housing Density) and which may have taller buildings, will still need to be appropriate to their context and setting and deliver high quality development overall and as required by the other policies in the plan.

Appendix I provides information on 'context heights' and the thresholds at which buildings will be considered 'tall' and therefore need to be assessed against the Skyline and Tall Buildings Policy. This is a skyline responsive approach and allows the assessment of impact to be tailored to local circumstances. Parts c and d have had the words 'high quality' inserted. It should also be remembered that this policy will be used in conjunction with other policies in the plan that go to more detail on expected qualities of development. Policy GP/QD Achieving high quality development identifies the expected qualities of development proposals including at parts c), i) and g).

The role and importance of Cambridge Commons and the role they have in allowing experience of the historic environment has been added to part b) of the policy and to the Supporting Information, 'The Cambridge Commons introduces a rural character that extends into the heart of the city and provide key opportunities to experience the historic environment, including scale of buildings, from these locations.' In addition, the following wording has been added 'rural and semi-rural character' to the Supporting Information to cover development proposals outside of Cambridge.

No change is needed to part a) for the protection of domestic scale building heights in Conservation Areas because Appendix I identifies the context height thresholds and also the areas where more detailed assessment will be needed. As such the triggers for assessment of tall building proposals are much more context led. Additionally, the policy already requires careful consideration of heritage assets which includes Conservation Areas. With regards to the application of the policy to the wider district, the Local

Plan covers the Greater Cambridge Area and the policy is written to apply to the City and South Cambridgeshire District. The context heights mapping provides a baseline to identify the contextually tailored thresholds at which the policy would be applied. It is unlikely that rural villages will experience pressure for tall buildings, even those at a modest scale, but if proposed, would be covered by the requirements of this policy.

Regarding the comment requiring development proposals to be to consider all viewpoints, the policy has not been amended as not all the identified viewpoints in Appendix I will need to be assessed as part of every proposal that triggers the application of the skyline policy. Appendix I makes it clear that there will be a process of identifying and agreeing relevant viewpoints, this process not only picking up the strategic views, but also local views to ensure comprehensive assessment of likely impact is made.

Additional wording 'to ensure a well-articulated skyline' has been added to address concerns are raised about height limits leading to a monotonous roofscape, suggesting the policy should encourage varied heights to maintain the character of the skyline.

The use of the word 'adequate' is consistent with the BRE guidelines 'Site layout planning for daylight and sunlight: a guide to good practice', which are the industry standard approach for the assessment of impact relating to daylight and sunlight.

Urban heat island effects are part of the microclimatic assessment have been added to the revised wording for part e).

Introducing the word 'historic' before 'towers' is not considered necessary. New towers that create positive additions to the skyline and maintain the character and appearance of Cambridge would be supported subject to being able to demonstrate appropriateness against the identified criteria and supporting Appendix I.

Microclimatic impacts, including glare and reflectivity, are identified and addressed as part of the policy wording part e).

Suicide prevention issues are understood but this policy is specifically dealing with tall buildings so it would be unwise to extend it to all building types in this policy. The requirement can be addressed through other relevant policies relating to the design of new buildings and public spaces. Minor text changes to part f) of the policy added to clarify that design measures need to be proportionate and also understand the public accessibility of any tall building.

The context height mapping establishes a prevailing height for an area (based on average heights in particular areas) and then the criteria are used to help assess and manage the impact of proposals, regardless of location, including development proposals along the A14 corridor. The wording to the policy says 'significant change' and the criteria and Appendix I are then there to provide a structure to ensure assessment of potential change and impact is made. The Areas of Search undertaken through the Skyline and Tall Buildings Strategy is a high-level strategic study that does not seek to restrict tall buildings or masterplan the sites considered in the site. Similarly, it does not pre-determine appropriate heights for development. It has been prepared to give a broad understanding of the thresholds in which new development at these sites would start to have adverse impacts on the city's skyline from the strategic viewpoints. Clearly this would require a more detailed assessment through the preparation of a planning application.

The term 'high quality' has been added to part d) of the criteria to set out the requirement for tall buildings to be an acceptable standard in terms of design. Additionally, taller buildings whether existing or new should be part of creating a well curated skyline and therefore it is not reasonable to apply a blanket approach setting out that historic buildings should remain the dominant elements on the city's skyline. Other matters relating to the design expectations are covered in supporting policies such as GP/QD parts c), g) and i) and do not need to be duplicated in GP/ST.

A number of representations identified inaccuracies, omissions and areas where further clarification was required within the Townscape Character Assessment for South Cambridgeshire. The assessment has subsequently been reviewed and refined, with amendments made where appropriate to improve its accuracy and robustness as part of the Local Plan evidence base.

It would not be appropriate to specifically identify Cambridge East in Appendix I of the Local Plan given this is broad guidance that should be applied to tall buildings across the districts. There is also no current proposed masterplan for Cambridge East and therefore the site is not referenced in the paragraph regarding clusters. Whilst clusters of taller buildings may be suitable at Cambridge East, this would need further testing through an evidence led masterplan process.

Through a comprehensive review of the city's strategic viewpoints, the Heritage Impact Assessment and Skyline and Tall Buildings Strategy have updated the initial 2018 viewpoints. As set out in the study, this has been informed by a range of evidence including the Townscape Characterisation Study, site visits and professional judgement.

Regarding 3d model requirements, Appendix I states that contextual elements should be provided within a 3d model, such as conservation areas and natural features where it is relevant to the application site. The extent of the model would need to be scoped with the Councils at the application stage. Given the file size of 3d models, the councils may require low detail versions to be supplied alongside higher detailed 3d models which may contain elements such as building materials.

Whilst it is noted that the Skyline and Tall Buildings Strategy is split into several documents, the councils are required to manage file sizes to ensure they can be easily downloaded.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Support of the Policy Points 1 a,b,c,d,e and Point 3, 6 and 7:</p> <ul style="list-style-type: none"> <li>• Strongly support Points 1b, c, d &amp; Point 3</li> <li>• Support Point a and E</li> <li>• Strongly Support 6</li> <li>• Point 7: define ancient and woodland trees explicitly as by the Woodland Trust</li> </ul>	<p>201872 (J Hurst), 207649 (Duxford PC), 207664 (K Holland)</p>
<p>Concern over the height of new buildings within Cambridge. The policies in the draft Local Plan sound reassuring, but the reality of the buildings around the main rail station (which make me feel like I'm in London rather than Cambridge) and the five-storey buildings currently being built right next to Coleridge Rec (Fanshawe Road development) leave me feeling concerned.</p>	<p>201934 (I Rudy)</p>
<p>The policy should not exclude tall buildings on other sites where they can be justified on a site by site bases through submitted evidence.</p>	<p>202496 (University of Cambridge)</p>
<p>Concerned about some limits and constraints in the current approach to density within the Local Plan, particularly the emphasis on conformity and heritage considerations. Automatic assessment triggers linked to building heights across different location types risks unduly constraining well-justified higher density development that would deliver benefits in terms of amenity, future transport provision, and long-term viability and sustainability. Greater flexibility needed.</p>	<p>203528 (Cambridge Ahead)</p>

<p>Microclimate adverse impacts should include overheating. Good luck with design quality given the boxes planned for the biomedical campus and the Kett site</p>	<p>202636 (C Pointon)</p>
<p>This is essential to prevent the Beehive site overshadowing residential homes, but clarity on acceptable heights between a traditional Cambridge terrace and non-residential could be helpful. Railpen obfuscated the height from the start and failed to provide a model. This must not happen again, it causes huge distress</p>	<p>205449 (B Smith)</p>
<p>Whilst we support the spirit of the draft policy it is considered that it should be revised to ensure that it does not unnecessarily conflict with wider aspirations for the optimisation of brownfield land impacting the ability to deliver on the aspiration for growth.</p>	<p>207448 (Pioneer Group Ltd)</p>
<p>St Matthews Centre, Sturton Street, Cambridge (HELAA Reference 59405)</p> <p>Proposal would be a disaster for this community:</p> <ul style="list-style-type: none"> <li>This Site was given an Overall Score of 'Red'. The exclusion of this Site must be permanently enforced. This will protect our vital, extremely limited and increasingly pressurised local amenity space. St Matthew's Piece is the only public park in North Petersfield. Unambiguous evidence of this is the sequence of five Planning Refusals since 2021 (none appealed) all pertaining to this area: 25/0432/TTPO, 24/0413/TTPO, 23/0119/TTPO, 22/0271/TTPO, and (most significantly) 20/04514/FUL.</li> </ul>	<p>207663 (K Holland)</p>
<p>Object Policy Point 1, 2, 3:</p> <ul style="list-style-type: none"> <li>Throughout this Policy AND the whole Local Plan: replace “changing climate” with “climate crisis”.</li> </ul>	<p>207665 (K Holland)</p>

<ul style="list-style-type: none"> <li>Point 1: Design solutions must "respond proportionately and actively to the emerging climate crisis" (not "positively respond to our changing climate").</li> <li>Point 2 must explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere.</li> <li>Point 2: all applications must explicitly address the impact of any development not only on future edifices but (more importantly) on surrounding townscape and biosphere.</li> <li>Point 3: delete the words "where possible"</li> </ul>	
<p>Generally support policy, but concern that it will still give developers too much freedom to extend the heights of buildings beyond the scale of neighbouring infrastructure. Having "hard" figures for heights is a necessary, but not sufficient condition. Any development must fit in with the local skyline, as well as complying with the height limits - this is a stronger requirement than any absolute height limit.</p>	201300 (N Campbell)
<p>Policy GP/ST clause 1(e) – glare (i.e. reflection of light from a glazed surface onto another surface or into a building or other amenity area) needs to be added to the list of adverse impacts on amenity and microclimate.</p>	210948 (Great Shelford PC)
<p>Clause 1(e) – glare (i.e. reflection of light from a glazed surface onto another surface or into a building or other amenity area) needs to be added to the list of adverse impacts on amenity and microclimate.</p>	201621 (Stapleford PC)
<p>We welcome the inclusion of a policy for tall buildings and the skyline. We are keen to support growth in appropriate locations whilst protecting and enhancing what is important in relation to the skyline of the City and surrounding area. Cambridge is set within a low-lying landscape. Much of the city is hidden within a well treed skyline, punctuated by a few landmark buildings. Maintaining the settings of highly</p>	208926,208927,208928, 208931, 210173 (Historic England)

graded heritage assets and well-known features on the skyline, including how they sit within the skyline, particularly from key views in and out of the City, will be important.

In the wider area, we are seeking to ensure that the rural character of the area is maintained and that even within the new settlements, buildings do not over-dominate the wider landscape and have a negative impact on the historic environment. The relatively flat nature of the area means that impacts can be felt over considerable distances; We welcome the detailed work that has been undertaken to prepare an evidence base in the form of the Skyline and Tall Buildings Baseline, Strategy and Guidance (although the detail is, at times, hard to follow – we recommend an executive summary is prepared to draw out the main points).

We note that the Local Plan policy wording itself is very similar to the previous Local Plan, albeit with greater emphasis on design quality and the addition of a further criterion relation to suicide prevention. We welcome the reference to the historic environment in criterion b of the Policy and seeking to protect important views; More generally, we consider that the policy currently underplays the semi-rural nature of parts of Cambridge and the surrounding area. In addition, development should be seen as an opportunity to enhance Conservations Areas and the skyline of the city in general. Finally, it will be important that increases in height do not affect our experience and perception of coalescence between the city and surrounding villages. The policy should be amended to better reflect these three points; We have some ongoing concerns regarding the densities and heights on some of the edge of Cambridge sites. Development at very high densities/heights has the potential to impact on the overall setting of

<p>this historic city. We appreciate that there will inevitably be a trade-off between height versus further urban expansion.</p> <p>We have particular concerns about heights in north-east Cambridge and remain so about impacts on views from Ditton Meadows and the Conservation Areas, as well as wider views approaching the City from the north-east and east; In relation to new settlements, there will still need to be some caution in relation to heights owing to nearby Conservation Areas and other heritage assets such as the Roman Road. In particular, we note that the Strategy does not consider Grange Farm. This needs to be addressed prior to Regulation 19, perhaps through an addendum to the Tall Buildings Strategy.</p>	
<p>Higher-density development in areas with strong transport and public service provision is fundamental to ensuring long-term viability. Significant concerns about some of the limits and constraints specified in the current approach to density, particularly the emphasis on conformity and heritage considerations. The automatic assessment triggers linked to building heights across different location types (as per Appendix H: Skyline and tall buildings guidance) risks unduly constraining well-justified higher density developments which would deliver clear benefits in terms of amenity, future transport provision, and long-term viability and sustainability.</p>	201678 (British Land)
<p>Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.</p>	210355 (Community Campaigner D Barton)
<p>Point a (Add): Mandatory protection for domestic-scale building heights, particularly in Conservation Areas. Point b "For Cambridge.... relevant viewpoints" - support. Point d - strongly support. Point e: the</p>	205467 (C Aman)

<p>use of "adequate" is too weak and undefined, particularly for surrounding properties or spaces. Must be clarified, strengthened and improved.</p> <p>On "microclimate", Point e is far too weak. It must also require that the effect of any development should prove that, at minimum, it will not increase (and, ideally, decrease) the Urban Heat Island Effect.</p>	<p>204883 (Federation of Cambridge Residents' Associations)</p> <p>204820 (M Cleminson)</p> <p>203691 (J Johnson)</p> <p>202991 (Cambridge Glenys Self)</p> <p>201512 (B Greig)</p> <p>201799 (J Neal)</p> <p>201841 (T Neal)</p> <p>201873 (J Brightman)</p> <p>201876 (J Hurst)</p> <p>205584 (S Buckingham)</p> <p>205664 (D Storey)</p> <p>207652 (Duxford PC)</p> <p>207661 (K Holland)</p>
<p>Policy is an improvement over the 2018 plan, but there are concerns about creating a permanent 'ring' of tall buildings that could alter the Cambridge skyline. Concern about identification of four sites for tall buildings. Clarification is sought on how Policy GP/ST aligns with existing masterplans, especially regarding the necessity of tall buildings for the West Cambridge site's objectives. Support is expressed for tall buildings that demonstrate architectural excellence, with a focus on creating distinct 'Landmark</p>	<p>204059 (Cambridge Past Present and Future)</p>

<p>Buildings' rather than just maximizing height. Concerns are raised about height limits leading to a monotonous roofscape, suggesting the policy should encourage varied heights to maintain the character of the skyline. There is a lack of confidence in the Councils' ability to enforce high design standards, emphasising that Policy GP/ST must include a commitment to reject substandard applications. Detailed policy amendments are suggested to strengthen the policy.</p>	
<p>Welcome policy's emphasis on design quality and on protecting Cambridge's heritage assets and historic skyline. At 1.b, replace "relevant viewpoints" with "all viewpoints" to strengthen this protection. At the same time, however, we recommend amending 1.a to recognise that building taller buildings in appropriate locations can have significant environmental benefits over lower buildings. In the supporting information, we recommend explicitly broadening suicide prevention guidance to all building types and noting that most suicides occur at or near residential dwellings.</p>	<p>203717 (Cambridge Green Party)</p>
<p>Brookgate has already destroyed the skyline and views from Lime Kiln Hill. This should be used as a case study/example of what to avoid.</p>	<p>202373 (A Carpen)</p>
<p>At Mission Street (Land south of Coldhams Lane) you are allowing buildings up to 20 metres? That is totally out of keeping with surrounding RESIDENTIAL BUILDINGS of two storeys</p>	<p>201251 (S Williams)</p>
<p>The commitment to domestic-scale building heights is not strong enough especially in view of the current pressure to build tall and densely (to fit many people into a small space and make huge statements for the sake of it rather than with truly uplifting buildings). Domestic scale buildings fit with the existing character of the city, create a sense of peace and calm and neighbourhood, and allow large</p>	<p>203838 (U Crook)</p>

<p>views of the sky, rather than being overshadowed and hemmed in (especially in a largely flat city) and a sense of being connected to the countryside around.</p>	
<p>Tall buildings are not appropriate within Girton's village landscape, which depends on open views, treed horizons, and the Girton Gap. The skyline is integral to Girton's identity. Tall buildings undermine heritage setting and rural landscape. The Girton Gap must remain visually open. GPC Requests to the Local Plan explicitly rule out tall buildings in Girton. Treat the Girton Gap as a sensitive skyline zone. Require visual impact assessments aligned with NP evidence.</p>	<p>202235 (Girton PC)</p>
<p>It is necessary to define 'tall buildings' within Policy GP/ST to avoid ambiguity. Point (b) should be revised to align with the NPPF and accommodate future clusters regarding impacts on the historic environment. Point (c) needs amendment to ensure the policy does not exceed committed development and remains consistent with guidance. Point (e) should allow for judgement and planning balance, rather than requiring applicants to demonstrate no impact. The term 'must' in the criteria for tall buildings should be replaced with 'should' to provide discretion for decision makers. Changes are needed to reflect Government intentions for effective land use and increased development density.</p>	<p>204192 (RailPen) 204429 (Brookgate land ltd and Network Rail)</p>
<p>Policy GP/ST and its supporting evidence fail to recognise the requirements of freight and logistics development and established employment areas, such as Bar Hill, which have buildings exceeding domestic scale. The policy applies a uniform urban-led approach that does not consider the diverse character of the Greater Cambridge area, particularly in South Cambridgeshire. Appendix H should define higher thresholds for tall or large-scale buildings in established employment areas, acknowledging existing structures that exceed domestic scale. The current policy may constrain</p>	<p>204463 (Tritax Big Box Developments)</p>

<p>appropriate industrial and logistics development by applying urban assessment criteria to rural and employment locations, which is seen as disproportionate.</p>	
<p>Policy repeats an issue with Policy 60 of the 2018 Cambridge Local Plan policy by continuing to imply that any building which breaks the skyline is unacceptable. Even modest additions at high level can break the skyline – it depends on where you are looking from. The policy would be clearer if it stated ‘developments that cause significant change to the existing skyline and / or are significantly taller....’. The policy extends into the villages and rural areas of South Cambridgeshire, so this clarity is necessary for new development at IWM Duxford – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.</p>	<p>208284 (Imperial War Museum)</p>
<p>It is unfortunate that this policy repeats an issue with Policy 60 of the 2018 Cambridge Local Plan policy by continuing to imply that any building which breaks the skyline is unacceptable. Even modest additions at high level can break the skyline – it depends on where you are looking from. The policy would be clearer if it simply stated: ‘developments that cause significant change to the existing skyline and / or are significantly taller....’. As this policy effectively uses the old Cambridge Local Plan Policy and extends it into the villages and rural areas of South Cambridgeshire, the above clarification is even more necessary – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.</p>	<p>208244 (Kings College)</p>
<p>The Tall Buildings Policy GP/ST will have a substantial effect on the character of Cambridge and any surrounding areas where they are applied. The skyline and streetscapes of Cambridge are distinctiveness and historic and the policy is weak as it does not assess and justify why there should be harm to that distinctive character.</p>	<p>210993 (C Newell)</p>

<p>The Tall Buildings policy GP/ST1 relies on an assessment of local context heights in Appendix H. This assessment is not one of those documents linked to the web page on Policy GP/ST and is confusing to access, being a large number of separate documents.</p>	<p>210994 (C Newell)</p>
<p>Appendix H is not always comprehensive and accurate and does not consistently assess the predominate height and character of the locality. Instead heights are based on the tallest, without considering why there is a single building, a historic landmark or small group of 'landmark' buildings of greater height than their surrounding buildings. The Tall Buildings Map in Appendix H includes rural villages in South Cambridgeshire and well outside the designated Cambridge City extent. There is no clarity about their inclusion in the Tall Buildings policy and why their townscape is being assessed in this section. If intended to be within the Tall Buildings Policy, their inclusion should be clear and justified, and if not, they should be excluded from the Tall Buildings Map.</p>	<p>210995 (C Newell)</p>
<p>Unlike the London Tall Buildings Policy, there is no aspiration on of outstanding design and landmarks, but instead the policy wording suggests tall buildings as the default. 1.18 The policy should emphasise high quality design at street level as well as the mentioned skyline and services. 1.19 The historic environment GP/ST1b should make clear that the towers to remain dominant within the last sentence are historic rather than new towers.</p>	<p>210996 (C Newell)</p>
<p>Unlike the London Tall Buildings Policy, there is no aspiration on of outstanding design and landmarks, but instead the policy wording suggests tall buildings as the default. 1.18 The policy should emphasise high quality design at street level as well as the mentioned skyline and services. 1.19 The historic environment GP/ST1b should make clear that the towers to remain dominant within the last sentence are historic rather than new towers.</p>	<p>210997 (C Newell)</p>

<p>Subject to the above, the Tall Buildings Map for outlying villages is at too small a scale to provide clarity about character areas. For example, many of the existing green spaces are missing and these maps are inconsistent with the village maps of the same locations.</p>	<p>210998 (C Newell)</p>
<p>The policy would be clearer if it simply stated ‘developments that cause significant change to the existing skyline and / or are significantly taller....’ As this policy effectively uses the old Cambridge Local Plan Policy and extends it into the villages and rural areas of South Cambridgeshire, the above clarification is even more necessary for Girton College – otherwise any new building or addition to the height, no matter how modest, would break the skyline from somewhere and potentially be unacceptable.</p>	<p>208299 (Girton College)</p>
<p>Support, recognising that Appendix H includes “While new settlements and employment areas such as science and technology parks may accommodate taller buildings due to their evolving context heights, proposals in these areas will still be assessed against these guidelines to ensure appropriate skyline integration and design quality.”</p>	<p>211549 (Martin Grant Land Limited)</p>
<p>Skyline and Tall Buildings Strategy The prescribed height thresholds (19 m, 25.5 m, 32 m) and the 13 m limit in the Suburban/Rural Height Zone are overly prescriptive for Cambridge East and should be replaced by a design-led approach.</p>	<p>209040 (Marshall Group Properties)</p>
<p>Cambridge is located in an environment where the land is flat and views are extensive. Such views need to be preserved. In this environment ‘big boxes’, with eaves heights of 24m, equivalent to a seven story building would be inappropriate. Neither Tritax and Newlands developments meet policy requirements nor the implied restrictions on the size and scale of rural developments. Any developments should be required to clearly demonstrate (including through 3D illustrations), at</p>	<p>211114 (Boxworth Parish Meeting on behalf of A14 Logistics Forum), 211436 (Boxworth Parish Meeting)</p>

<p>consultation phase, maximum size, including overall heights, of the buildings on developments and how through comprehensive landscaping their developments will not be visible beyond the site boundaries. Supported logistic/commercial developments on the A14 corridor should consist of small to medium size buildings. Eaves heights should be restricted and clearly set out; In this context 10/12 m would seem appropriate.</p>	
<p>The proposed warehouses are excessively large and tall for the flat, open landscape near villages, causing significant environmental and visual impact.</p>	207727 (Swavesey PC)

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

### Abbreviations

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

### Summary of Main Issues:

Comments offered general support for the aims of the policy in securing sustainable development. Others sited that it must be applied flexibly so it does not undermine development capacity and viability.

A number of comments, particularly from those representing arts venues, highlighted the importance of public art. They said a Percent for Art initiative or Cultural Infrastructure Levy should be applied. Artists should be embedded in the master planning process and Create Cambridge should be engaged. Comments requested that the Public Art Supplementary Planning Document should be updated.

There was also a number of comments focusing on the opportunities for public realm and cultural infrastructure improvements around the Elizabeth Way bridge area of Cambridge. The area provided an opportunity for a cultural hub community project, with a redesigned area focused on pedestrians and cyclists over cars. The Eastern Gate Public Realm Improvement Area policy has also addressed these comments.

Cambridge Past, Present and Future considered there should be more guidance on the design of public realm areas. Mothers CAN Cambridge said areas should include engaging elements for children in public realm designs. It should reference the needs of older

people, including way finding and dementia friendly design principles. Health was also highlighted, and how spaces can help address social isolation and poor health outcomes. One comment said further work was needed to consider the impact of urban design and building facades on the levels of mental stress within the brain, and particularly people who are neurodivergent / ADHD / Autistic.

A common thread throughout comments on the policies was that active travel routes must meet the five core design principles. It was requested that mandatory requirements should be set for permeability and that routes must be suitable for children, promoting safe travel to schools. There was also challenge that the plan did not sufficiently reference accessibility and addressing the needs of disabled people. The need for seating in development and the public realm was also mentioned. Comments suggested that policy should require street design to encourage active travel and discourage car use, not merely avoid vehicular dominance.

Cambridgeshire County Council said that the policy needed to recognise the value of public rights of way. The British Horse Society said it should also recognise equestrian users where green corridors, public realm routes and landscape connections were being planned.

Other suggestions included addressing the paving over front gardens, with impact on both place and flood risk sited. The policy should consider the impact of street clutter, and ensure space for pedestrians when parking spaces are occupied. The importance of post development monitoring, which should be funded by developers. And developments should include dog-friendly open spaces.

Natural England welcomed part 1c in particular. One comment said it should remove reference to historic street furniture, while other comments focused on enhancing historic appeal. On 1.c.ii, the Cambridge Green Party considered it should require at least

20% of land area to be allocated to nature. Others highlighted the importance of selecting trees that could deal with the impacts of climate change to avoid high failure rates. Trees also needed to be managed.

Anglian Water welcomed reference to the inclusion of green and blue infrastructure as one of the key factors to achieving high quality development.

Some representatives were concerned about the quality of open spaces being eroded. The issue of potholes was also raised.

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

Requirements for public art provision as part of development proposals is established in the policy and has been amended in criteria 1.e.iv and within the supporting text to emphasise the importance in fostering a sense of identity and response to culture and nature.

Wording has been added into criteria 1.d.ii and 1.e.ii to prevent negative impacts on climate and character from paving over front gardens. This wording was originally set out in the adopted Cambridge City Council Local Plan (2018) and has been successfully applied in planning decision-making. It is appropriate to reflect this policy in the Greater Cambridge Local Plan as it relates to both urban and rural contexts.

References to street lighting, street furniture and elements of well designed public realm has been developed to incorporate the needs of all users and reference is made in the supporting text to the reduction of hostile architecture that prevent inclusivity and undermine the effective use by older and younger people, homeless people and skateboarders who may use the spaces in a

variety of ways. The supporting text also references the research into the benefits of inclusive design to mental health and wellbeing. Additional wording has been added to criteria 1.a.iii) to include imaginative and natural play within high quality public realm.

Further reference has been added to reflect perceived safety and the design of secure, convenient and appropriately designed street furniture such as bins, to prevent street clutter and to set out measures to manage the risk of hazards and harm to people.

A number of comments seek to add issues which are already addressed effectively by other policies, such as active travel or references to biodiversity. The plan as a whole provides an effective set of policies to address these issues. Reference to specific open space standards have been considered in the Biodiversity and Green Spaces Chapter, supported by new evidence on creation of a suitable set of policy metrics and standards responding to Natural England guidance. A wide variety of groups and needs were highlighted. A clear aim of the policy is to ensure that streets and spaces are accessible to all. Policy BG/TC: Tree canopy cover and the tree population provides a clear approach to trees, including the selection of species, and monitoring requirements.

Amendments have been made to Policy S/PRIA/EG: Eastern Gate to reflect the opportunities around the Elizabeth Way roundabout.

Table of representations:

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
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<p>Support Create Cambridge in asking that:</p> <ul style="list-style-type: none"> <li>• public art and cultural activation link to a Percent for Art initiative or Cultural Infrastructure Levy</li> <li>• the Public Art SPD is explicitly referenced</li> <li>• artists are appointed at RIBA Stage 2–3, embedded in masterplanning</li> <li>• Create Cambridge is engaged as advisor/consultee/co-curator (with communities) in developing plans and strategies for public art and cultural activation</li> </ul>	<p>202056 (H Chamberlain), 202139, 202870, 202871, 202305 (Cambridge Junction), 202198 (H Tam), 202317, 202753 (Cambridge Junction/ Create Cambridge), 202409 (T Shaw), 202411 (Kettle’s Yard), 202685 (T Altmann), 202715 (W Townsend), 202782 (S Lee), 202931 (R Terry), 202974 (T Flinders), 203023 (The Arts Theatre Cambridge), 203046 (Cambridge City Council Liberal Democrat Group), 203337 (N Ellis), 203434 (S Ashworth), 203486 (L Heap), 203515 (D Lever), 203629, 203870, 205040 (University of Cambridge), 203850 (N</p>
<p>This ensures cultural value is designed in from the outset.</p>	

	<p>Yeni), 204683 (NEUBAU Architecture), 204836 (L Matthews), 204998 (Wysing Arts Centre), 205062 (H Paterson), 205135 (J Walsh), 205293 (A C de Azevedo Lamha), 205314 (N Oakley), 205323 (L Howse), 205389 (A Seiglow), 205399 (Cambridge Junction), 202386 ( J Webber), 202460 (K Jones)</p>
<p>Existing policy on Public Art is based on SPDs originating with SCDC and City respectively over 10 years ago. New thinking on art policy and public art has developed significantly and the Local Plan needs to reflect this new reality. Similar cities to in mainland Europe and North America have well developed and modern policies that consider public art as an element of an arts eco-system that includes healthy living and sustainable communities. Co-operation between the arts communities, authorities and residents are the basis for vibrant cultural life.</p>	<p>202148 (R Stobart)</p>
<p>The area around the Elizabeth Way bridge should be transformed including a cultural infrastructure project. S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub project.</p>	<p>208508 (Cambridge Green Party),</p>

<ul style="list-style-type: none"> <li>• Crossing the Elizabeth bridge should be a pleasant experience causing active users to pause and take in the advantageous views. Provide green links between open spaces and facilitate vertical growth and urban greening where possible, including the bridge</li> <li>• Provide streetscapes encouraging active lifestyles, skate friendly seating, sheltered spots, bicycle/scooter parking, sufficient street lighting, access to water, toilets, F+B offerings</li> <li>• With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, the new urban realm surrounding the infrastructure should aim to achieve better quality materials, increase landscaped areas and biodiversity and create green corridors connecting N/S and E/W - promoting desire lines and prioritising active transport modes (pedestrians of all ages, cyclists, scooters a.o.) around the infrastructure and to and across the river</li> <li>• With reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project, crossing the Elizabeth bridge should be a pleasant experience causing active users and visitors to pause and take in the advantageous views.</li> <li>• Re-design of the car dominated transport roundabout to include cycle lanes and four required pedestrian &amp; cyclist crossings, all of which should prioritise pedestrians and cyclists over cars, and integrate practical and desired lines for better N/S and E/W connectivity.</li> <li>• End of Walnut tree avenue access road into a shared surface for recreational use, offering advantageous West facing views of the river with additional integrated seating and planting - a public realm outdoors area.</li> </ul>	<p>208513, 208514, 208518, 208519, 208520, 208521, 208522, 208523, 208524, 208525, 208526 (NEUBAU Architecture), 204894 (M Cleminson) 204537 (T Woodcock)</p>
<p>All new developments should include dog-friendly open spaces where dogs can be exercised off-lead.</p>	<p>203260 (Cllr C Hofman)</p>
<p>Wording of this policy should be strengthened at multiple points. Criterion 1.a.ii should explicitly include space for biodiversity and nature alongside drinking water, shade and shelter. Criterion 1.b.ii should be amended to require street design to encourage active travel and discourage car use, not merely avoid vehicular dominance. Criterion 1.c.i should remove reference to historic street furniture, while 1.c.ii</p>	<p>203718 (Cambridge Green Party)</p>

<p>should require at least 20% of land area to be allocated to nature. The supporting information should emphasise flood risk reduction, biodiversity, and the use of natural, permeable paving materials.</p>	
<p>Policies GP/QP and BG/EO are interrelated; consider placing them in the same topic area or cross-referencing them. Definitions of external spaces are inconsistent; a standardised description should be provided across policies. The policy should include more guidance on the design of public realm areas, such as streets and civic squares. The wording of the policy is repetitive and unclear. Retain and update Policy 66 on paving over front gardens, as current guidance lacks clarity and enforcement. Factors increasing front garden conversions include parking competition, avoiding permit fees, and enabling EV charging. Introduce a financial mechanism for monitoring and enforcing landscape quality to address resource gaps in delivery. Developers should contribute to a landscape monitoring fund to ensure compliance with approved conditions and management plans.</p>	<p>204101 (Cambridge Past Present and Future)</p>
<p>1. c. ii. In our experience at Northstowe Phase 1, native varieties are often now unsuitable and experience high failure rates in the recent hot, dry summers, wet winters, and clay soil. We would encourage the LPA to emphasise the second clause in this point. Establishment must be improved via careful species selection at the design stage, maintenance during the first years after planting, with a backstop of robust planning enforcement when schemes are not effectively implemented.</p>	<p>208057 (Northstowe TC)</p>
<p>Policy must ensure active travel routes must meet the five core design principles. Design quality should be tested at the planning stage, not left to later detail</p>	<p>202509 (H Brown)</p>
<p>The policy is very positive in that it prioritises pedestrian led movement. There is space for improvement: the policy on street clutter needs to also apply to the infrastructure policy around communications facilities in Policy I/DI 1.a, and the policy as laid out here in section 1.a.iii</p>	<p>202635 (P Tribble)</p>

<p>should require adequate footway for pedestrian movements when parking is occupied, not just when it's not.</p>	
<p>Extensive natural grazing in Cambridge and keeping it affordable deserves more attention as it is a distinctive and valued feature of the city. Open spaces are being heavily encroached on and the small open areas within developments are often formal and boring. Many of the aims and aspirations listed are laudable but as many are advisory they lack teeth resulting in open spaces which are of low quality and have little consideration for supporting biodiversity. Just as with climate change, measures are considered, then dismissed because too expensive, or the development would have to be scaled back to afford them</p>	205099 (A Copping)
<p>Recommend adopting policies similar to The London Plan S4, which emphasises accessible routes for children to play areas, schools, and youth centres to promote safe and independent movement. And for large-scale public realm developments to include incidental play spaces to enhance playability.</p>	205597 (Mothers CAN Cambridge)
<p>Advocate for incorporating more engaging elements for children in public realm designs, referencing the success of Dinky Doors as an example of effective engagement.</p>	205598 (Mothers CAN Cambridge)
<p>Good to make HIAs a formal requirement. Important points about social isolation and poorer health outcomes but add community severance issue where high traffic levels/layout impede neighbourliness. Active Travel glib phrase - walkers/wheelers don't always feel safe near cyclists and micromobility vehicles - speed, footway abuse, lack of lights - build in remedies. Add building continuous footways at junctions fostering pedestrian priority/wheeling accessibility/slowing vehicle speeds. Tree management</p>	201633 (Cambridge Living Streets)

<p>issue - fine to plant but leaf fall/lack of maintenance brings trip hazards/impassable footways. Address exiting as well as new routes.</p>	
<p>There seems to be a disconnect between what people think and what planners propose. The main complaint about delivery of pleasant places to live in is potholes. But planning is (mostly) City and District while roads are (mostly) County so there appears to be a disconnect. Even where the cityscape is the responsibility of the same local authority as the planning, we see a dreadful mess of street furniture with bad maintenance, poor cleaning and a proliferation of fly-posting. Could we have it recognised in the Local Plan that work is being done on this? Meanwhile forget public art</p>	201733 (T Stone)
<p>We welcome this policy, particularly part 1c, which recognises the many benefits of incorporating natural elements into development to respond to climate change.</p>	207635 (Natural England)
<p>Anglian Water welcomes reference to the inclusion of green and blue infrastructure as one of the key factors to achieving high quality development. Public art requirements should exclude applications for utilities development.</p>	210214 (Anglian Water)
<p>Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.</p>	210359 (Community Campaigner D Barton)
<p>Highways &amp; Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and</p>	210363 (Community Campaigner D Barton)

<p>should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.</p>	
<p>Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.</p>	210366 (Community Campaigner D Barton)
<p>The Plan throughout barely references transport by wheeled mobility aid, giving the impression it does not address the needs of disabled people.</p>	204124 (S Hughes)
<p>Transport at pedestrian speed by wheeled mobility aid is commonly referred to as 'wheeling'. Every reference to 'walking' in the Plan should either be changed to 'walking and wheeling', or it should be made absolutely clear that when the term walking is used, it is used inclusively, encompassing the use of wheeled mobility aids (the former is preferable).</p>	205496 (S Hughes)
<p>There is confusion in this policy over what 'wheeling' means'. It should not refer to skateboarding, which is entirely separate.</p>	205497 (S Hughes)
<p>More seats in public green spaces, especially for the elderly.</p> <p>Greater efforts to reduce traffic speed and reduce pollution - providing charging points throughout residential areas, not just in public car parks.</p> <p>Better control of e-bikes etc. More encouragement of pedal bikes with obvious priority on all streets without cycle lanes for pedestrians and pedal bikes.</p>	202361 (R Lind)

<p>Please commission a specialist paper on neuroarchitecture and the impact of urban design and building facades on the levels of mental stress within the brain, and particularly people who are neurodivergent / ADHD / Autistic.</p>	<p>202363 (A Carpen)</p>
<p>Barratt Northampton supports Policy GP/QP and its strong emphasis on delivering high-quality landscape and public realm. Barratt Northampton also welcomes the clarity that GP/QP provides for the delivery of coherent landscape and public realm across phased developments. The flexibility within the policy allows site-specific interpretation while maintaining high design standards.</p>	<p>210503 Barrat Homes Northampton)</p>
<p>Objection to Policy GP/QP, it should consider individual site circumstances to avoid undermining development capacity and viability.</p>	<p>203103 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>
<p>Policy would benefit from reference to cycle parking being located conveniently in order to help reduce nuisance parking of bikes.</p> <p>Policy could explicitly recognise the value of PROW in providing connectivity between rural communities. Development should not hinder this function but should seek to augment it, and where there is limited rural connectivity, expanding the PROW network should be championed.</p>	<p>210583, 210617 (Cambridgeshire County Council)</p>
<p>The Plan acknowledges the significant demographic shift anticipated in Greater Cambridge, projecting a 26% increase in residents aged 65+ by 2031, with the most rise among those aged over 80 years old, raising concerns about dementia prevalence. Whilst policies such as GP/PP, criterion 1.a.ii, and GP/QP, criterion 1.e, address accessibility and inclusivity for older people and those with reduced</p>	<p>210635 (Transport 2000 Cambs &amp; Suffolk)</p>

<p>mobility, they lack dementia friendly design principles. It is suggested that Policy GP/QP could be strengthened by including features like clear wayfinding and appropriate street furniture to improve cognitive accessibility.</p>	
<p>Please learn to hyphenate nouns where necessary. Also 'espond' is not a word.</p>	201252 (S Williams)
<p>Support the ambition of the policy to create inclusive, well designed public spaces that promote health, wellbeing and accessibility. However, the BHS is concerned that the policy focuses heavily on pedestrian and cycle movement but does not explicitly recognise equestrian users where green corridors, public realm routes and landscape connections link to the wider countryside or ROW network. Policy should explicitly recognise equestrian users.</p>	208656, 208657 (British Horse Society)
<p>We consider the threshold for the provision of public art should be increased to 100 dwellings. Sites delivering smaller quantities of units are typically within more rural or village areas where the provision of public art may not be appropriate for the area. It also adds further financial and administrative burden on developers of small sites.</p>	208360 (T Elbourn)
<p>Do what Cambourne did</p>	204017 (S Rogers)
<p>We support the inclusion in The Local Plan the requirement to use native species in landscaping. We recommend that should anyone proposing to plant species as part of development submit a planting schedule that specifies species native to the area and sourced locally to maintain genetic integrity and ecological resilience. The schedule should also include details of establishment care, such as watering and maintenance, to ensure successful growth and long-term survival.</p>	211170 (Environment Agency)
<p>It is recognised that high quality landscaping and public realm are a key element of a successful community.</p>	211550 (Martin Grant Land Limited)



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

### Abbreviations

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

### Summary of Main Issues:

There was broad support, including strong support for the policy from a range of individuals and organisations. There were also some comments that there needs to be a balanced application of the policy to avoid hindering housing development in sustainable locations. While another comment was that the policy was not strong enough, and proposals must do no net harm to existing landscape character.

Some representations proposed amendments to the wording of the policy including Cambridge Past, Present and Future who suggested that there could be a new section to identify opportunities for introducing new landscape features to compensate for any loss or degradation and that landscape assessment should be part of the pre-application process. There were also objections from a small number of developers that the requirements of the policy are unduly onerous and not consistent with National policy as there are no valued landscapes within Greater Cambridge.

There were some locationally specific comments. Girton Parish Council requested specific measures to protect their village identity and the Girton Gap. Haslingfield Parish Council raised concerns about the East West Rail proposals. There was also a comment

that the boundaries of the Landscape Character Assessment are incorrect in Stapleford and Sawston. Another commented on some of the details in the landscape character assessment.

There was some support for the continued protection of Important Countryside Frontages, with calls for the ICF within the Stapleford and Great Shelford Neighbourhood Plan be included on the Policies Map and that there is another potential ICF identified in Stapleford. There were also objections to three of the ICFs saying that they did not meet the definitions and should be deleted.

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

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

Support for the policy from a number of representations was noted.

Whilst it is recognised that there are no defined valued landscapes within Greater Cambridge, the intention of the policy to protect, conserve and enhance local landscape character is in line with NPPF section 12 on achieving well-designed places, which says that planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change'. The policy follows a landscape character approach to ensure that new developments respect local landscape character and features as set out in the Greater Cambridge Landscape Character Assessment (LCA). The policy will be considered along with all the other policies in the Local Plan when considering planning applications giving a balanced approach.

A reference to the importance of pre-application discussions, particularly for major development has been include in the supporting text of the policy. A number of other specific policy amendments were proposed, but these were not considered necessary, and the policy is already effective in addressing landscape issues.

The locationally specific comments have been considered. The area referred to as the Girton Gap is also within the Green Belt. Policies within the Local Plan would apply were development proposed, and it does not warrant specific policy reference. The East West Rail project is the subject of a different consenting regime (a Development Consent Order), and impact on landscape character and visual impact will be considered as part of that process.

With regards to the Greater Cambridge LCA, this was undertaken at a strategic level for the whole of Greater Cambridge. There will never be an exact boundary between landscape character types and sometimes there is an area of transition which would need to be considered at the planning application stage when more detailed assessment is carried out. The LCA is considered a robust part of the Local Plan evidence base and does not warrant a review at this time.

Some comments reference issues outside the remit of this policy, such as enhancing connectivity, or considering urban heat island effects. These issues are addressed by other policies.

The comments on the ICFs were considered in the Protected Open Space Review (2026) in Appendix E and the responses are summarised here. Neighbourhood Plan ICF designations already form part of the development plan and are shown on the policies map and it is not necessary to also include them within the Local Plan. An assessment of the two sites put forward in Stapleford found that neither meet the criteria and so wouldn't be included. The sites where respondents objected to the ICFs were considered again, but the Councils consider they meet the criteria and there has been no visible change since the Protected Open

Space Evidence Report (2025) and so they should remain as ICFs in the Local Plan. A proportionate approach has been taken to the Protected Open Space Report and many of the ICFs have already been through an examination for the adopted South Cambridgeshire Local Plan. Therefore, it was entirely appropriate for the 2025 Review to focus on whether there had been any change in circumstances to warrant a change of position for these sites.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support Point 1a & e. Strongly support Point 1b, c & d & Point 3.	202164 (J Neal), 203694 (J Johnson), 205469 (C Aman), 205669 (D Storey), 202997 (Cambridge G Self), 204983 (Federation of Cambridge Residents' Associations), 201511 (B Greig), 201844 (T Neal), 201875 (J Brightman)
Fully support this important policy	201018 (M Colville)
Object and request changes to plan: <ul style="list-style-type: none"> <li>• The policy must explicitly require that development proposals demonstrate no net harm to existing landscape character, including microclimate, biodiversity, and historic townscape.</li> <li>• Replace “should” with “must” throughout</li> <li>• Add requirement for independent landscape character assessments for all major developments</li> </ul>	204901 (M Cleminson)

<ul style="list-style-type: none"> <li>• Add explicit reference to the Urban Heat Island Effect and the need to mitigate it through landscape design.</li> <li>• Add requirement for long-term maintenance plans for landscape interventions.</li> </ul>	
<p>Support the policy in all respects. Preservation of landscape character is vital if fostering a sense of living in a great place is desired. We agree the setting of villages in South Cambs should be protected and enhanced. We also specifically support the continued protection of identified Important Countryside Frontages.</p>	203550 (Ickleton PC)
<p>Strongly supports but suggests amendments for clarity and effectiveness. Consider whether other documents should be referenced such as the Tall Buildings Baseline, Strategy and Guidance (2025) and the townscape study. The respondent believes evidence of consideration for the GC Landscape Character Assessment should be required during the pre-application stage, rather than just accompanying the planning application.</p> <p>They propose amendments to the text, 1a) addition of 'diversity and natural beauty'. New 1b) is suggested to ensure that changes are appropriate to the landscape character type. New subsection to identify opportunities for introducing new landscape features to compensate for any loss or degradation</p>	204113 (Cambridge Past, Present and Future)
<p>Vistry supports the principles of the policy aimed at protecting and enhancing landscape character but stresses the need for a balanced application to avoid hindering housing delivery in sustainable locations. Vistry advocates for a site-specific assessment of landscape contributions based on existing conditions. Vistry notes that not all land in the wider landscape setting of Cambridge contributes meaningfully to its character, and suggest that development can enhance landscapes by strengthening</p>	204874 (Vistry Group)

<p>green infrastructure and reinforcing defensible settlement edges, while positively supporting the wider growth strategy.</p>	
<p>Do what Cambourne did - a lovely rural feel perimeter public bridleway</p>	<p>204018 (S Rogers)</p>
<p>The Girton Gap is the most critical element of landscape character, preventing merger with Cambridge and sustaining rural identity. The 2021 Green Belt Assessment confirms AR1 release would erase the gap. Landscape character includes green corridors, hedgerows, and village edges. Landscape design must protect the parish's separate historical identity. GPC Requests to the Local Plan explicitly name and protect the Girton Gap in GP/LC. Reject AR1 release proposals. Support planting and habitat corridors consistent with Girton NP.</p>	<p>202237 (Girton PC)</p>
<p>Girton's public realm must connect green spaces, Active Travel, and heritage settings, creating calm, inclusive, walkable environments. Residents value rural character + functional community spaces. Public realm must integrate planting, safety, and village-appropriate materials. Active Travel is central to public realm improvements. GPC Requests to the Local Plan: Require all public realm upgrades to reflect rural village character. Integrate green infrastructure (trees, SuDS, habitat corridors). Align landscape design with Active Travel and community wellbeing</p>	<p>202236 (Girton PC)</p>
<p>Object because the development of Cambourne North is contingent upon the EWR project, which must adhere to Policy GP/LC that emphasises respect for landscape character. The proposed EWR alignment is expected to fundamentally change landform, fragment the landscape, intrude into long-distance views, and erode rural tranquillity, contradicting Policy GP/LC.</p> <p>The Local Plan inadequately justifies the acceptance of EWR as infrastructure, failing to assess its</p>	<p>202030 (Haslingfield PC)</p>

landscape impacts in accordance with Policy GP/LC and neglecting alternative alignments. Claims of potential mitigation through future planting and earthworks are deemed insufficient, as they cannot restore lost landscape character or historic features within the Plan period.	
Although the Landscape Character descriptions in the CBA 2021 LCA are reasonable, the boundaries shown for them in Stapleford and Sawston are wrong so should be corrected to ensure that the open Chalk Hills are properly segregated from the lower lying settled and wooded valleys that they look over. The current boundary was challenged by the inspector during the appeal that granted a new retirement village on the hill outside Stapleford.	202863 (M Foote)
Support Policy GP/LC, highlighting its recognition of the importance of safeguarding landscape character and green corridors in the Greater Cambridge area. The policy's requirement for development to positively respond to its landscape context aligns with national planning policy objectives for environmental protection and landscape quality.	204472 (Tritax Big Box Developments)
Object to Policy GP/LC since the proposed requirements of the draft Policy are considered to be unduly onerous and are not justified, positively prepared or consistent with National Policy. The proposed wording of the policy should explicitly recognise that both new settlements or extensions of settlements may not be deemed to "protect, conserve and enhance" the local landscape character, and features in full since development provides an inherent and unavoidable change.	205063 (Endurance Estates)
Part 1.a. of Policy GP/LC, to be consistent with the NPPF (paragraph 187), should be revised to conserve the intrinsic character and beauty of the local landscape as there are no valued landscapes.	205134 (Lolworth Developments Ltd)
Where there are existing public rights of way the character of those should be retained by green corridors or other means.	210615 (Cambridgeshire County Council)

<p>Paragraph identifies the need to consider the cumulative effects of development on local landscape character. The local plan should consider opportunities to improve connectivity between adjoining or adjacent development sites so that provision is made for non-motorised routes that link developments. The existing practice of treating each development as an isolated site, even where there are separate parcels within a larger development, restricts the ability of the highway authority to require each individual development to contribute to the creation of a more connected PROW and no-motorised user network.</p>	<p>210616 (Cambridgeshire County Council)</p>
<p>The assessment of landscape setting and contribution should be undertaken on a site-specific, case by case basis, having regard to the existing condition and character of the land concerned. Not all land within the wider landscape setting of Cambridge currently makes a meaningful contribution to its character or special qualities. Where development proposals can deliver landscape enhancement, strengthening green infrastructure and reinforcing defensible settlement edges, they can positively contribute to the objectives of the policy while also supporting the wider growth strategy</p>	<p>210254 (Vistry Group)</p>
<ul style="list-style-type: none"> <li>• Support the policy but highlights the need to update the draft Policies Map to include the Stapleford &amp; Gt Shelford Neighbourhood Plan and specifically Policy S&amp;GS 13, which designates a new Important Countryside Frontage.</li> <li>• Concerns are raised regarding Policy GP/LC clauses 1 and 3, stating that their application to Stapleford parish is inappropriate due to inaccurate mapping of the Gog Magog Hills. An urgent review of the Gog Magog Hill Landscape Character Area is requested.</li> <li>• Concern that the mapped extent of the Gog Magog Hills is inexplicably shrinking over time, which undermines Policy GP/LC. Specific inaccuracies regarding the landscape character area 7B: Gog Magog Chalk Hills and its boundaries are detailed.</li> </ul>	<p>201622 (Stapleford PC)</p>

<ul style="list-style-type: none"> <li>Inaccurate mapping has already impacted local planning decisions, including an appeal decision that approved a retirement care village on Green Belt land in part due to discrepancies in landscape character assessments.</li> </ul>	
<p>Include the Stapleford and Great Shelford Neighbourhood Plan (adopted Oct 2025), in particular to include Policy S&amp;GS 13 which introduces a new Important Countryside Frontage between 41 Gog Magog Way and houses at Chalk Hill, Stapleford.</p>	210949 (Great Shelford PC)
<p>Support the policy to protect Important Countryside Frontages where landscape with strong countryside character penetrates or separates villages and retains their sense of connection with their rural surroundings. There are two in Stapleford that meet this objective and the visual and physical tests set out in the GP/LC policy and supporting documents, yet the policy map shows no protection for these frontages even though similar or less important frontages are protected in neighbouring villages. The policy should be consistently applied across the villages and these two ICFs (on Mingle Lane and Gog Magog way) added on the policy map.</p>	202909 (M Foote)
<p>Object as consider that the land off Home End, Fulbourn does not meet the definition of Important Countryside Frontage and is deleted. It is surrounded by buildings and a car park. There are sport and recreation facilities and associated car parking areas between the site and the countryside beyond.</p>	201959 (KG Moss Will Trust & Moss Family)
<p>Object because it is considered that the land off Ditton Lane in Fen Ditton does not meet the definition of an Important Countryside Frontage, and it is requested that this designation is deleted from this site.</p>	202093 (J Francis)
<p>Remove the ICF allocation on the northern boundary of the Land south of Church Street, east of High Street, Guilden Morden (HELAA Ref. 40300). Site does not have a strong countryside character and it</p>	206698 (E W Pepper Ltd)

<p>is visually enclosed by significant vegetation screening; there are no views out to the countryside side to protect.</p>	
<p>Land to the South of Station Road, Harston</p> <p>The Station Road frontage of the Site, together with the Station Road frontage of Baggot Hall farm to the east, is proposed to continue to be subject to the 'Important Countryside Frontage' Policy, under Policy GP/LC: Protection and enhancement of landscape character.</p> <p>Object to Policy GP/LC and question the robustness of the Protected Open Spaces Review (2025) as merely a desk-based review. We believe this requires a more detailed assessment including site visits to better understand the specific context and landscape character. This should be undertaken to inform the preparation of the Regulation 19 consultation of the Plan.</p>	<p>203436 (Jesus College)</p>
<p>The countryside east of Cambridge is not empty land awaiting "opportunity". It is an established and strategic green resource, already referenced in the existing Cambridge Plan, and it underpins Cambridge's success in multiple ways. The existing Greater Cambridge Plan rightly identifies this area as important green infrastructure and recognises its role in safeguarding landscape character and environmental connectivity. However, these policy aspirations are currently being undermined by external NSIP proposals. The Greater Cambridge Local Plan must require that proposals affecting land outside the Green Belt demonstrably align with Greater Cambridge's vision, evidence base and environmental strategies.</p>	<p>209118 (S Hepworth)</p>
<p>Current policy wording of South Cambs Local Plan (2018), Policy NH/2 would be more appropriate, which states that "Development will only be permitted where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area</p>	<p>211551 (Martin Grant Land Limited)</p>

<p>in which it is located.” If the current drafting remains, it needs to be recognised that the LVIA and GI Strategy for the planning application for Cambourne North will state that the scheme takes account of the Specific Landscape Sensitivities, and complies with the Specific Landscape Guidelines, of LCA 4A Croxton to Conington Wooded Claylands (within which the site lies), as defined in the GC LCA (2021).</p>	
<p>The policy GP/LC is inconsistent with NPPF Paragraph 174 in that it should allow for the designation of Valued Landscapes. The CA assessment does not include development of the last 5 years and assessments do not include the whole Plan area as the Assessment Units Areas do not extend to parish boundaries. Part 1 paragraph 1.2.13 gives the specific planning issues not covered by the study, which include ecological factors, cultural heritage/archaeological factors, visual amenity and technical design/feasibility factors. It is clear that these omissions do affect the assessments, such as the merging of Pampisford and Linton landscape areas, the detail of the Assessment Units Areas (such as for LIN01-04) and the conclusion that the Pampisford CA 8A is not of ecological interest.</p>	211909, 211910 (C Newell)
<p>The eastern Granta Valley of Hildersham, Linton and Bartlow should have been assessed separately in the CA. Pampisford Lowland Chalklands Landscape Character Area 8A extends further eastwards to Linton and Bartlow. The slightly sloping valley edges photographed as Area 8A on page 164 are of Pampisford and are not characteristic of the landscape of the River Granta Valley further east and the map on the same page shows the fields eastwards are no longer the large fields described in paragraph 2 of the text. In the same paragraph on page 164, it is stated that ‘This is not an ecologically rich landscape’ which is incorrect, as the relevant ecological records in the mapped area around Linton and Hildersham show. By excluding the eastern Granta from LCT9, the assessment also excludes part of the County Wildlife Site, the chalk river, the Pocket Park. The reference to Linton having ‘grown</p>	211911 (C Newell)

substantially since 1950s' obscures its role in the 1970s Local Plan as a planned village expansion to protect the Cambridge Green Belt.



## Policy GP/HE: Historic Environment

### Abbreviations

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

### Summary of Main Issues:

A number of comments offered general support for the policy.

Historic England welcomed the inclusion of policies for the historic environment, and the positive strategy for the historic environment as set out here and elsewhere in the Plan They suggested that the heritage policies could be more spatially specific, and make more of opportunities to enhance the historic environment. They recommend adding more about the importance of heritage in place-making, quality of life and well-being as well as being a key economic driver as well as the importance of protecting and enhancing heritage because of this. Also seeking to enhance existing provision and create greater access to other heritage assets to spread the impact on heritage destinations.

The Cambridge Green Party said the policy should clarify the benefits of conserving heritage assets, through the positive contribution of heritage conservation to the cultural identity, wellbeing and sustainability of communities. The policy could also explicitly recognise the importance of integrating heritage into public realm improvements. A range of other suggestions were proposed regarding restoration of heritage.

Cambridge Past, Present and Future considered more was needed in the policy to protect and enhance heritage assets. The plan must include a formal statement recognising the city's global heritage value as a cohesive whole. Broaden the Scope of Protection: Policy must explicitly recognise the world-heritage significance of the city. Another representor considered the policy was weak, and did not provide a Historic Environment Strategy, just a list of existing tools.

Some comments highlighted the need to manage the proposed growth with heritage impacts through a Historic Environment Strategy and that the Plan does not make enough reference to the importance of the special character of Cambridge.

Vistry Group considered the policy was not consistent with the structured approach set out in national planning guidance. Others suggested it was overly prescriptive.

A number of specific locations were highlighted, including at Girton, the area of Cambridge around the Elizabeth Way bridge, and the St Andrew the Less Community Project.

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

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the broad support expressed for the positive strategy for the historic environment and the role of heritage in placemaking, community identity, wellbeing and the local economy. Representations also highlighted the importance of heritage in supporting sustainable communities and improving access to historic assets, alongside suggestions to strengthen strategic and spatial elements of the policy approach.

In response, the policy has been amended to strengthen and clarify the role of the historic environment within the development strategy. This includes refining wording to explicitly recognise the contribution of heritage to cultural identity, placemaking, wellbeing and sustainability, alongside its economic importance. The policy has also been updated to encourage the enhancement of existing heritage provision and improved access to a wider range of heritage assets.

The Councils note representations regarding the requirement for Heritage Impact Assessments and their relationship to validation requirements. The policy retains the requirement for proportionate Heritage Impact Assessments where development may affect heritage assets or their settings, reflecting their importance in informing decision-making.

Comments seeking greater spatial specificity, a more strategic approach to heritage capacity, and the introduction of additional standalone strategies or policies are noted. The Councils consider that the Local Plan, together with supporting strategies and guidance, provides an appropriate framework for managing the historic environment, and no further policy changes are made in response to these matters.

Representations concerning active travel routes, bridleways, design approaches, simplified consents, contractor directories and other operational matters fall outside the scope of this policy and have not resulted in amendments.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>The policy should be revised to clarify the benefits of conserving heritage assets. In 2.a, wording should be amended to state that proposals consider the positive contribution of heritage conservation to “the cultural identity, wellbeing and sustainability of communities,” not just “sustainability,” ensuring it reflects its broader social and cultural value. In 2.c, a final sentence should be added: “This could include a broad range of uses, both residential and commercial, consistent with historical mixed-use patterns.”</p> <p>This recognises many heritage assets were originally mixed-use, encourages higher density, mixed-use development, and makes better use of existing historic buildings</p>	<p>203720 (Cambridge Green Party)</p>
<p>We welcome the inclusion of policies for the historic environment. We broadly support the draft policies to date although we offer the following suggestions as to further enhancements:</p> <p>i. Policy wording should have a more local flavour whilst being consistent with the NPPF. Heritage policies should be more spatially specific, unique to the area, describing the local characteristics of the area and responding accordingly with policies that address the local situation.</p> <p>ii. The Strategy policy could make more of opportunities to enhance the historic environment, recognising its important role in placemaking and the contribution made by heritage to well-being as well as to the economy. The strategy should also acknowledge the increased pressures being placed on existing heritage destinations and promote and facilitate greater access to other heritage sites in order to reduce the current pressures on honeypots.</p>	<p>208925 (Historic England)</p>

<p>iii.The part of the policy and supporting text relating to enabling development should be deleted.</p> <p>iv.Additional clarification is needed regarding the identification of non-designated heritage assets</p>	
<p>Historic England welcomes this policy. We welcome the positive strategy for the historic environment as set out here and elsewhere in the Plan. We welcome the requirement for Heritage Impact Assessments. Although these are often known as Heritage Statements at Application stage. We recommend adding more about the importance of heritage in place-making, quality of life and well-being as well as being a key economic driver as well as the importance of protecting and enhancing heritage because of this. We recommend adding text that that recognises the growing pressures on heritage of a rapidly growing population. We recommend including in the strategy something about seeking to enhance existing provision and create greater access to other heritage assets to spread the impact on heritage destinations. This might include specific encouragement of other heritage/nature base areas to open up to visitors.</p>	210174 (Historic Environment)
<p>Figure 134: Non-designated heritage assets (rather than non-designed)</p>	210189 (Historic England)
<p>Vistry support the intent of the policy. However, it is considered that the reference within the policy to proposals being supported by a Heritage Impact Assessment would be more appropriately addressed through the Council's validation requirements, rather than forming part of the policy wording itself. In addition, while the policy states that “The Local Planning Authorities will balance the need for development with the conservation, enhancement and enjoyment of the historic environment”, wording does not reflect the structured approach required by the NPPF. It is therefore recommended that the policy is refined to explicitly reflect this test.</p>	204875, 210255, 210256 (Vistry Group),

<p>There is a concern that the policy does not address heritage, prompting a recommendation for a Historic Environment Strategy and an additional policy (1g) to protect and enhance heritage assets.</p>	<p>207391 (Cambridge Past, Present and Future)</p>
<p>Believes the policy is weak and not significant:</p> <ul style="list-style-type: none"> <li>• The draft plan lacks an overall Statement of Significance and fails to acknowledge Cambridge's world heritage significance, particularly along the river corridor.</li> <li>• The Historic Environment Strategy is criticized for being a mere list of existing tools without strategic assessment or evaluation of Cambridge's heritage.</li> <li>• The 2021 Strategic Heritage Impact Assessment did not provide a holistic analysis of Cambridge's significance or threats, ignoring Conservation Area Appraisals.</li> <li>• The Council has not completed the Historic Core Conservation Area Management Strategy or the Making Places for People SPD, which are essential for addressing capacity issues in the historic core.</li> <li>• The proposed Policy and Strategy are deemed premature and ineffective without clear statements of significance and addressing key capacity issues</li> <li>• There is a concern that the policy does not address heritage, prompting a recommendation for a Historic Environment Strategy and an additional policy (1g) to protect and enhance heritage assets</li> </ul>	<p>205451 (J Preston),</p>
<p>Before the 2006 Cambridge Local Plan, planning polices sought to protect the special character of the historic university city. There has been no strategic review of the success or failure of the 2006 Plan in achieving its objectives in relation to the historic environment. This lack of strategic review is</p>	<p>211448 (J Preston)</p>

<p>compounded by the new Local Plan (and the development strategy). There is little mention of the role of the historic environment in making Cambridge an attractive place in which to live and work. Cambridge meets UNESCO's criteria for World Heritage status.</p>	
<p>Rural Active Travel routes and PROWs should be bridleway to include horseriders so that we can get to/from historic environment.</p>	204022 (S Rogers)
<p>Girton's historic environment includes heritage buildings, village form, and landscape setting, especially the Girton Gap and church environs. Village heritage contributes strongly to identity. Urbanising forms undermine heritage setting. Heritage interacts closely with landscape/green space. GPC Requests to the Local Plan: Require heritage-led design for all development in Girton. Protect settings of key heritage assets, including views. Consult Girton NP heritage evidence.</p>	202238 (Girton PC)
<p>Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project. The designation of this asset as a noteworthy architectural asset, albeit where the asset should be championed through regenerative and community-focused practices. The space is currently undervalued and transition experiments such as the 'Out of the dark' urban light show showcased an alternative, community-led and culturally-advancing use for the space. Attention should be paid to how the cultural economy of such an asset can be utilised, with a designation and allocation for cultural use in the Local Plan being the first step.</p>	204482 (T Ziromskas)
<p>All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition</p>	210360 (Community Campaigner D Barton)

Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.	210361 (Community Campaigner D Barton)
Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.	210362 (Community Campaigner D Barton)
Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards.	210364 (Community Campaigner D Barton)
New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.	210365 (Community Campaigner D Barton)
Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I support retention as a noteworthy 70’s Heritage asset. I support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.	204309 (L Cooke), 204307 (A Giarlis)
Objects to the wording of Policy GP/HE, stating that Part 2(b) is overly prescriptive and inconsistent with national policy regarding the historic environment. The use of the term 'must' is seen as problematic as	203947 (Emmanuel College), 206063 (Brookgate land and Network Rail)

<p>it may hinder high-quality, sustainable development by suggesting an absolute requirement to conserve or enhance heritage assets.</p>	<p>Infrastructure Ltd), 204483 (Tritax Big Box Developments)</p>
<p>The plan must include a formal statement recognising the city's global heritage value as a cohesive whole. Broaden the Scope of Protection: Policy must explicitly recognise the world-heritage significance of the city. Shift from "Narrow" to "Cumulative" Heritage Impact Assessment. Heritage-Driven Green Infrastructure, mitigate Visitor Pressure, and strategic park expansion. Reform the Historic Environment Strategy. Include dynamic strategy diagram which considers whole life of heritage assets. Complete a Making Space for People SPD to manage pressure on limited space in historic core.</p>	<p>204163 (Cambridge Past Present and Future)</p>
<p>As there are specific policies relating to both designated and non-designated heritage assets, why is this policy needed? The requirement for a Heritage Impact Assessment could (if considered necessary given the Council's application validation requirements) be easily added into the other policies. Notwithstanding this comment, in limb b), the meaning of 'nature' with respect to heritage assets needs to be clarified.</p>	<p>208245 (Kings College), 208300 (Girton College)</p>
<p>Strong support for the policy, especially 2a, where it takes in account "the positive contribution that conserving heritage assets can make to the sustainability of communities".</p>	<p>204926 (M Cleminson), 204561 (The St Andrew the Less Community Project), 204766 (NEUBAU Architecture Ltd)</p>
<p>Pleased to see the Plan recognises Greater Cambridge's historic environment as an important social, cultural, economic, environmental and community resource, which adds to the quality of life of residents</p>	<p>208458 (The National Trust)</p>

<p>and visitors (para 7.56) and Wimpole's contribution to this as an important visitor attraction with historic merit.</p>	
<p>Brookgate Land Ltd and Network Rail Infrastructure Ltd object to policy GP/HE as worded.  Part 2(b) is overly prescriptive and not fully consistent with national policy or the statutory framework for decision-making in the historic environment. The use of the word 'must' risks precluding high-quality, sustainable development by implying an absolute requirement to conserve or enhance heritage assets in all circumstances, rather than allowing for a balanced planning judgement.  National policy and legislation require decision-makers to have special regard to the desirability of preserving heritage assets, while weighing this against the scale of harm, site context and public benefits.  Policy GP/HE should therefore be amended to adopt more proportionate wording that reflects this balanced approach, consistent with the NPPF 2024 and statutory duties.</p>	<p>204063 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)</p>
<p>Support. It is recognised that it is important that development proposals that may affect heritage assets, or their settings, are carefully considered.</p>	<p>211552 (Martin Grant Land Limited)</p>
<p>Townscape Character Assessment:  - Page 149 shows Area 206 as the historic settlement core. It actually extends further west.  - The materials should include the natural slate roofs characteristic of C18 and C19 development, which are contemporary with the gault bricks.  - The Map does not have an area called 207.  - Area 209 is Linton Village College rather than 'a small secondary school'.  - Area 210 contains a listed thatched timber framed cottage and curtilage listed farm buildings.</p>	<p>211908 (C Newell)</p>

<ul style="list-style-type: none"> <li>- Area 211 comprises 21st century infill, an exception site of affordable housing and 2 unplanned sites outside the village, which do not contribute to townscape character.</li> <li>- Page 138 does not show the key open spaces which form the core and separation of the two settlements.</li> <li>- Area 194 is Granta Park centred on the listed C18 Abington Hall and its historic Lodge, Gardeners Cottage, walled garden and parkland. It is separate to the historic villages. Page 140 incorrectly describes this as Up to 4 storeys Industrial/Scientific type and that the Building style is of warehousing and offices in sheet metal and glass. The assessor has clearly not visited the site.</li> </ul>	
<p>The policy and supporting information for GP/HE does not appear robust because it appears inconsistent with the NPPF and should refer further to significance and harm. The supporting information should be more robust; for instance to work with communities etc to conserve and enhance the historic environment wherever possible could be inconsistent with the statutory duty. If the Heritage Impact Assessment is not to accompany every application that potentially affects a heritage asset or its setting, the last paragraph of supporting information should make clear that it is the local authority (not the applicant) who will decide whether the proposal will have an impact on heritage assets.</p>	211912 (C Newell)
<p>The CBA maps accompanying the proposed Allocation Sites confusingly show the listed buildings as a small dot of similar pink to red colours whereas the locally listed buildings are shown to the full outline of the buildings. It would be clearer and more proportionate if both groups and the Monuments were shown to the outlines of the buildings and if there were more variation in the colours of the listed building categories.</p>	211913 (C Newell)
<p>Figure 134 has an error - Non-designated heritage assets (rather than non-designed)</p>	211981 (Historic England)



## Policy GP/HA: Designated heritage assets

### Abbreviations

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

### Summary of Main Issues:

Some comments offered general support, including the need to protect designated heritage assets.

Historic England provided detailed comments on the policy criteria, including it should be clearer that harm should be avoided in the first instance, and also a policy on enabling development is not necessary.

Cambridge Green Party considered the policy should reference the use of sustainable materials, encouraging more environmentally sustainable building practices.

Some representations do not consider the policy aligns with National planning policy guidance, particularly how heritage assets should be considered in the planning balance. Imperial War Museum said the policy needed to be clearer regarding how it would be applied

Anglia Ruskin University consider the boundary of the Mill Road Conservation Area warrants a review. National Trust asked for another example of a Historic park and garden to be added, Wimpole Hall.

### Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the range of representations received, including support for the policy's overall approach to conserving designated heritage assets and recognising their importance to local character and identity. Comments also highlighted the need for alignment with national policy and legislation, and for the policy to appropriately reflect the balancing exercise required by the National Planning Policy Framework and the Planning (Listed Buildings and Conservation Areas) Act 1990.

In response, the policy has been amended to improve clarity and consistency with national policy, including reinforcing that harm to designated heritage assets will be considered in line with the NPPF's clear and convincing justification and planning balance tests. Amendments also refine wording on demolition of buildings contributing to Conservation Areas, clarifying the circumstances in which loss may be justified, and strengthening references to heritage at risk and opportunities for repair, regeneration and adaptive reuse.

The Councils note representations seeking further flexibility in policy wording, including concerns that elements of the draft policy were overly prescriptive or insufficiently explicit in reflecting the balancing exercise between harm and public benefits. The policy has been reviewed in this regard, with wording amended where necessary to ensure it reflects a proportionate decision-making approach while continuing to secure the conservation and enhancement of heritage significance.

Representations concerning active travel routes, bridleways, contractor directories, design approaches, and unrelated infrastructure matters are noted but fall outside the scope of this policy and have not resulted in amendments.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>It is important that policy is reviewed to ensure that it is in accordance with the advice contained within the draft revised NPPF which is due to be adopted in June/July 2026.</p>	<p>203382 (ESCO project)</p>
<p>The boundary of the Mill Road Conservation Area warrants review. As the Conservation Area Appraisal (2011) notes 'Anglia Ruskin University provides a variety of modern buildings, mostly of no special merit, which butt up to the western boundary of the cemetery'. ARU consider this is a fair assessment and do not consider the inclusion of the southernmost buildings on their original East Road site within the Conservation Area designation are warranted.</p>	<p>203998 (Anglia Ruskin University)</p>
<p>Vistry support the overall vision and objectives of the proposed policy. Although, it is noted that the principles set out within the policy closely mirror those contained within Policy GP/HE. The policy would benefit from being combined with Policy GP/HE.</p>	<p>204876 (Vistry Group)</p>
<p>Criterion 1 sets an inappropriate tone. Amend criterion 1 to make it clear that harm should be avoided in the first instance. Criterion 4 We welcome the reference to heritage at risk. Allocations should reference any relevant HAR status and encourage positive solutions/identify opportunities for their conservation and enhancement. Criterion 5 should be deleted, as a policy on enabling development is not a necessary component of a local plan document. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. Paragraph</p>	<p>210175 (Historic England)</p>

<p>7.62 could be much clearer in relation to the definition of designated heritage assets. Put simply, designated heritage assets are Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monument. Paragraph 7.70 – 7.72 We recommend that these paragraphs should be removed for the reasons set out above.</p>	
<p>Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.</p>	204023 (S Rogers)
<p>Designated heritage assets must be protected within their landscape and village context, not isolated or overshadowed. Assets rely on rural setting for meaning. Over-intensification threatens their character. Views and approaches are significant. GPC Requests to the Local Plan: Protect setting, approaches, and views of designated assets. Reject high-density forms that affect heritage significance. Require heritage-informed site design.</p>	202239 (Girton PC)
<p>Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings. These same people should be readily contactable for new construction.</p>	210368 (Community Campaigner D Barton)
<p>Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015. Area Expansion of housing must revert to traditional timeless designs that confer</p>	210369 (Community Campaigner D Barton)

<p>many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.</p>	
<p>Strongly support. Just as Scheduled Ancient Monuments and Conservation Areas are shown on the Policies Map, It would be useful for listed building to be annotated.</p>	<p>204168 (Cambridge Past Present and Future)</p>
<p>St Andrew the Less is a site of historic interest and I support any efforts made by the community group to restore and bring the church building and grounds back to community use. A viability will decide if the church building currently on the HAR can be restored and upgraded to include modern utilities.</p> <p>Support the retention of historically important features including the Grade I listed organ attached to the church building.</p>	<p>204792 (NEUBAU architecture ltd)</p>
<p>Welcome this policy's emphasis on adaptive use and regeneration of heritage buildings, which can deliver significant carbon savings. However, in 2.c, "Use high-quality materials" should be revised to "Use high-quality, sustainable materials," encouraging more environmentally sustainable building practices.</p>	<p>203721 (Cambridge Green Party)</p>
<p>Objection to the wording of Policy GP/HA, stating it does not allow for any harm to designated heritage assets and neglects the required balancing exercise as per the National Planning Policy Framework (2024) and the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>The respondent highlights that Sections 66 and 72 of the 1990 Act require decision-makers to consider the desirability of preserving the setting of listed buildings and the character of conservation areas, indicating that harm should be identified and weighed in the planning balance.</p>	<p>204490 (Tritax Big Box Developments), 203960 (Emmanuel College), 207449 (Pioneer Group Ltd), 204078 (Brookgate Land Ltd and Network Rail Infrastructure)</p>

<p>The NPPF (2024) allows for harm to designated heritage assets if justified and outweighed by public benefits, which the proposed policy fails to reflect, making it inconsistent with national policy and legislation.</p> <p>The mandatory language in Part 2 of the policy overstates statutory and policy tests, limiting professional judgement and balancing, which the respondent argues should be revised.</p> <p>The respondent recommends amending Policy GP/HA to align with statutory wording and the NPPF approach, suggesting the use of proportionate language that allows for a comprehensive assessment of impacts on heritage significance.</p>	
<p>Support the overall vision and objectives of the proposed policy. Although, it is noted that the principles set out within the policy closely mirror those contained within Policy GP/HE. In Vistry and The Quay Estate's view, the policy would benefit from being combined with Policy GP/HE.</p>	210257 (Vistry Group)
<p>The requirement in point 2 that development proposals must 'preserve or enhance' and comply with the rest of strands a) to g) of this policy is not in line with statutory duty in Sections 16, 66 or 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (which requires 'special attention' to be paid). It is similarly not in accordance with paragraphs 213 to 215 of the NPPF where, in some circumstances, public benefits can outweigh harm to heritage significance. As drafted, this is unreasonably prescriptive. In point 3 (a) who 'formally' assesses this (ie whose opinion determines if a building is considered unsound)? Similarly, how could an applicant ever demonstrate that 'all possible measures' have been explored in point b). It is not clear if all of strands a), b) and c) must be met or if these are either / or situations.</p>	208246 (Kings College), 208285 (Imperial War Museum), 208301 (Girton College)

<p>Para. 7.66 notes historic landscapes including historic parks and gardens are particularly important in South Cambridgeshire where they add interest and variety to the countryside. Grade II* Pampisford Hall and Grade II* Croxton Park are specifically highlighted in the South Cambs district but Grade I Wimpole Hall RPG which is by far the largest Registered Park and Gardens, and one of only two Grade I RPG in Greater Cambridge, is not mentioned which fails to recognise its importance and rarity (only around 10% of England's RPG are designated Grade I). The text should be amended to include Wimpole Hall Registered Park and Garden.</p>	<p>208459 (The National Trust)</p>
<p>It is recognised that the requirement to 'preserve and enhance' is rooted in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act, whilst the similar concept of 'sustain and enhance' is found at Paragraph 210 of the current NPPF.</p> <p>2.a. should be reworded to: "Pay special attention to the desirability of preserving or enhancing the significance of the designated heritage asset(s) and its setting, and the character or appearance of Conservation Areas including views into, within and out of them" as development may not always meet the current wording of "Preserve or enhance the significance of the designated heritage asset(s) and its setting".</p> <p>This rephrasing will bring the policy in line with the wording of the Act and NPPF as referenced above, and removes the apparent contradiction created by the current wording. Reordering this section so that the current points 1. and 2. are reversed would also seem logical to help this.</p>	<p>211553 (Martin Grant Land Limited)</p>
<p>This policy also appears to be trying to do quite a lot and might benefit from being split into policy relevant to listed buildings and policy relevant to conservation areas (rather than trying to do both</p>	<p>211554 (Martin Grant Land Limited)</p>

<p>under one heading, leading to comments on importance of original fabric and layouts, alongside more generic requirements). This could still be in the same policy, but under separate headings.</p>	
<p>For consistency with the 1990 Act, GP/HA1 should include setting and curtilage listed structures. For consistency with NPPF, there should be mention of designated landscapes and mitigation of harm. GP/HA2c when referring to character of the area, it should be clear that this is the designated area, not the locality of the asset, especially if the surroundings of an asset are unsympathetic.</p>	211914 (C Newell)

## Policy GP/ND: Non-designated heritage assets

### Abbreviations

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

### Summary of Main Issues:

Some comments offered general support for the policy. Historic England welcomed inclusion of the policy, and suggested a series of clarifications be made to the supporting text particularly on how they are identified.

Some comments highlighted specific buildings that they considered warranted stronger protection.

Other comments considered the policy is not consistent with national planning guidance. Care should be taken to ensure that non-designated heritage assets are not by default elevated to the status of Designated Assets. The policy needed greater flexibility.

### Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the strong support expressed for the protection of non-designated heritage assets and their contribution to local character, identity and sense of place.

The Councils also acknowledge representations which raised concerns that the draft policy could be interpreted as requiring the retention and enhancement of non-designated heritage assets in all circumstances, potentially going beyond the balanced approach set out in national planning policy.

In response, the policy has been amended to align more closely with the National Planning Policy Framework (2024). The previous wording seeking to ensure the retention and enhancement of non-designated heritage assets has been revised to seek their protection and enhancement, while retaining the requirement for a balanced judgement to be made based on the significance of the asset and the scale of any harm or loss.

Comments regarding the identification of non-designated heritage assets, including local lists and the Historic Environment Record, are noted and are addressed through supporting text rather than policy wording.

Overall, the principal amendment arising from consultation has been to refine the policy wording to better reflect the proportionate and balanced approach set out in national planning policy while continuing to support the protection and enhancement of non-designated heritage assets.

[Table of representations:](#)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
Can stronger protections be put in place on buildings like the Romsey Labour Club and the Hobson Street cinema buildings?	203810 (A Carpen)

<p>Care should be taken to ensure that non-designated heritage assets are not by default elevated to the status of Designated Assets. The policy implies a similar level of assessment, protection and recording for non-designated assets as would be expected for, for example, listed buildings</p>	<p>203387 (ESCO Prospect)</p>
<p>South Cambridge (but not Trumpington) has very few listed buildings or non-designated heritage groups of buildings south of Hills Rd Bridge. Yet the attractive red brick group buildings of Homerton College align with attractive nineteenth century buildings on Hills Road (St Johns Church). There are many attractive Arts &amp; Craft houses in the area. The Capturing Cambridge website has documented their history. Surprisingly there is no listing for Homerton apart from the College's Arts and Craft Dining hall? No mention either of Homerton avenue of mature trees with its cow parsley or gardens</p>	<p>205416 (Federation of Cambridge Residents' Associations)</p>
<p>The draft policy seeks to “ensure the retention and enhancement” of non-designated heritage assets. National policy does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public benefits. Draft Policy GP/ND should be amended to reflect the NPPF’s proportionate approach and allow impacts to be assessed through balanced decision-making.</p>	<p>207450 (Pioneer Group Ltd)</p>
<p>Girton’s non-designated heritage includes village-pattern structures, open rural edges, and valued community spaces. NDHAs shape village identity even without formal listing. Loss would erode local character. They interact with green spaces and the Girton Gap. GPC Requests to the Local Plan:</p>	<p>202240 (Girton PC)</p>

<p>Require assessment and retention of NDHAs. Integrate NDHAs into development layouts. Avoid erosion of rural character.</p>	
<p>Non-designated heritage asset with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I support retention as a noteworthy 70's Heritage asset. Support regeneration and re-use of the EW Bridge and underpasses as a pedestrian/cycle friendly, cultural hub.</p>	<p>204305 (NEUBAU Architecture Ltd)</p>
<p>Strongly support the protection of non-designated heritage assets.</p>	<p>204179 (Cambridge Past, Present, and Future)</p>
<p>LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.</p> <p>Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).</p> <p>Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area's founding or history locally or places of worship</p>	<p>210358 (Community Campaigner D Barton)</p>
<p>Object to the proposed wording of Policy GP/NP. The policy goes beyond national planning policy by seeking to 'ensure the retention and enhancement' of non-designated heritage assets. The NPPF does not require retention in all circumstances, but instead requires a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss. The proposed wording removes this necessary flexibility and risks precluding appropriate development regardless of context or public</p>	<p>204082 (Brookgate Land Ltd and Network Rail Infrastructure)</p>

<p>benefits. Policy GP/ND should be amended to reflect the NPPF's proportionate approach and allow impacts to be assessed through balanced decision-making.</p>	
<p>We welcome the inclusion of a policy on non-designated heritage assets.  Paragraph 7.76 We recommend including a link to the criteria. Paragraph 7.76 The final bullet point – it should be noted that not all entries on the HER are Non-designated heritage assets. A planning judgement (by a 'plan-making body') is needed to determine whether or not something is a non-designated heritage asset. Inclusion on the HER alone is not sufficient. Please refer to this in this paragraph. Paragraph 7.78 We welcome the inclusion of links through to the Cambridgeshire Local Heritage List Portal. Paragraph 7.79 This paragraph should make it clear that other ways that non-designated heritage assets may be identified are through: Local Plans; Neighbourhood Plans; Conservation area appraisals and reviews.</p>	<p>210176 (Historic England)</p>
<p>Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.</p>	<p>204026 (S Rogers)</p>
<p>Objects to the wording of Policy GP/NP, stating it exceeds national planning policy by mandating the retention and enhancement of non-designated heritage assets.</p>	<p>204497 (Tritax Big Box Developments)</p>
<p>It is recognised it is helpful that the policy sets out how proposals to alter, extend or demolish non-designated heritage assets will be assessed.</p>	<p>211555 (Martin Grant Land Limited)</p>

## Policy GP/CC: Adapting heritage assets to climate change

### Abbreviations

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

### Summary of Main Issues:

There is broad support for this policy. Historic England welcomed the inclusion of this policy. It should highlight the need to take a whole buildings approach. National Trust supported the policy approach.

Girton Parish Council raised a range of issues, including that the plan should support sensitive, heritage-compatible climate adaptations, and should not compromise heritage significance. Cambridge Past, Present, Future consider the plan lacks a clear sequential approach to retrofitting historic buildings. Without a requirement to prioritise less harmful measures first, such as improved insulation, there is a risk of unnecessary harm to heritage assets through more intrusive options like solar panel installations.

### Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

- The Councils note the support for the policy and the desire to balance heritage conservation against energy efficiency measures. It is felt the policy and supporting text strike the right balance between these issues, actively encouraging innovative, sensitive and high-quality interventions.

- The Council notes the support for landscape based carbon measures and CC/DC set out how this can be achieved as well as BG/EO to utilise greening for adaption and cooling.
- The suggestions to promote a sequential Whole Building approach are noted. It is agreed this is widely considered best practice and therefore wording has been added to the policy to recommend this approach is employed where appropriate.
- The Councils note the comment regarding retention of older buildings. Policies CC/CE, GP/HA and GP/ND are felt to strongly cover this point in their policy wording and supporting text.
- In response to Historic England, the suggested guidance has been added into the policy wording.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Climate adaptation must respect heritage fabric while promoting resilience through nature-based measures and sensitive retrofits	202241 (Girton PC)
The policy lacks a clear sequential approach to retrofitting historic buildings. Without a requirement to prioritise less harmful measures first, such as improved insulation, there is a risk of unnecessary harm to heritage assets through more intrusive options like solar panel installations. The plan should explicitly reference standard BS EN 16883, which provides a structured sequential process for energy upgrades in heritage settings. This is seen as a necessary addition because the current reference to PAS 2035 is insufficient for protecting the unique significance of historic fabric.	204186 (Cambridge Past, Present, Future)

<p>We strongly support this policy and would like to see a greater reference to applying weight to climate considerations in the valance of affecting heritage, for example the use of PVs on heritage roofs, or adapting windows</p>	<p>204969 (Mothers CAN Cambridge)</p>
<p>Heritage must be adapted without compromising significance. Landscape-based climate measures (shade, planting) work well in Girton. Avoid intrusive urban solutions. Requests to the Local Plan: Support sensitive, heritage-compatible climate adaptations; Use rural-fit landscape interventions to reduce heat/flood risk; Prohibit intrusive, large-scale engineered forms.</p>	<p>205575, 205576 (Girton PC)</p>
<p>Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.</p>	<p>204028 (S Rogers)</p>
<p>We welcome reference to heritage assets in this policy.</p> <p>We recommend that the policy should highlight the need to take a whole building approach.</p> <p>We welcome the various hyperlinks to publications. We also recommend including the following link: Energy Efficiency and Retrofit in Historic Buildings   Historic England</p>	<p>210177 (Historic England)</p>
<p>Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.</p> <p>Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official</p>	<p>210356 (Community Campaigner D Barton)</p>

<p>Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.</p>	
<p>Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual and group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.</p>	<p>210357 (Community Campaigner D Barton)</p>
<p>We would like to see more historic buildings retrofitted with sustainability measures. Max Fordham have experience of successfully doing this with case studies such as Trinity College New Court Grade I listed retrofit, The Engine Shed Stirling, integration of heat pumps and solar panels onto a number of heritage assets including the Kings College Cambridge Chapel roof. We would like to see great consideration of the importance of climate change mitigation and adaptation be considered weighing up any impacts on heritage assets.</p>	<p>204615 (Max Fordham)</p>
<p>It is important for heritage assets to contribute to addressing climate change. The National Trust is supporting research into delivering retrofit for heritage buildings to identify issues in practical delivery of historic building retrofit and better understand the challenges. We support Policy GP/CC which establishes how works to enhance the environmental performance of heritage assets will be balanced against the need to protect and enhance the character and significance of that asset.</p>	<p>211083 (National Trust)</p>



## Policy GP/AR: Archaeology

### Abbreviations

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

### Summary of Main Issues:

There was broad support for the policy's objective of protecting archaeological assets as an important part of Greater Cambridge's historic environment and local identity.

Comments were made seeking stronger requirements for archaeological assessment to be undertaken at an early stage and to inform planning proposals, site layouts and masterplans. Respondents also requested clearer guidance on the timing of archaeological investigations.

Concerns were raised about the potential for development to harm buried archaeological remains. Respondents emphasised the importance of protecting archaeological deposits and avoiding unnecessary disturbance through appropriate design and mitigation measures.

Further representations supported the integration of archaeological assets into development where feasible, enabling archaeology to contribute positively to place-making, heritage interpretation and local character. Comments were also made on the wider role of heritage in supporting regeneration and enhancing the attractiveness of local centres.

Overall, respondents supported the policy direction while seeking stronger emphasis on early archaeological assessment, the protection of archaeological remains, and the contribution of archaeology and heritage to local identity and development

### Response to main issues raised in representations:

The Councils' response to the matters raised in the draft Local Plan (Regulation 18) consultation includes:

The Councils note the support expressed for the proposed policy and the importance of archaeology in understanding and conserving the area's historic environment. The Councils also acknowledge representations seeking stronger recognition of the need for archaeological assessment to inform planning proposals at an early stage and to ensure archaeological considerations are integrated into the design and masterplanning process.

In response, the policy has been amended to clarify that Archaeological Assessments should inform planning proposals, including through masterplanning. This change reinforces the importance of considering archaeological constraints and opportunities early in the development process and supports the objective of preserving archaeological remains in situ wherever possible.

The Councils consider that the policy already provides a robust framework for the assessment, investigation and protection of archaeological assets, including requirements for appropriate assessment, investigation and recording, and a presumption in favour of in-situ preservation where development affects scheduled monuments or archaeological sites.

Comments relating to active travel routes and bridleway access to heritage assets are noted. However, these matters fall outside the scope of this policy and have not resulted in amendments.

Overall, the principal amendment arising from consultation has been to strengthen the role of archaeological assessment in informing planning proposals and masterplanning from an early stage in the development process.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Archaeology is important as it links past and present and helps develop a sense of continuity	202183 (M MacGinley)
Archaeological assets must be treated as integral to Girton's long historical continuity. Archaeology should be assessed early in the planning process. Development must avoid harm to buried remains. Archaeology strengthens heritage identity. GPC Requests to the Local Plan: Require early archaeological assessment; Protect archaeological deposits from disturbance; Integrate archaeology into design where feasible.	202242 (Girton PC)
The policy should reference the importance of archaeological assessment informing planning proposals including masterplans. The policy should provide clearer guidance on the appropriate timing of archaeological assessment.	210178 (Historic England)
The respondent supports the proposed wording of Policy GP/AR.	204501 (Tritax Big Box developments)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit heritage assets.	204030 (S Rogers)
It is recognised it is helpful that the policy sets out how proposals that may affect sites of known or potential archaeological importance or interest will be assessed.	211556 (Martin Grant Land Limited)

This policy appears more robust than that relating to other heritage assets. It includes significance, the NPPF tests, harm and justification and the presumption in favour of preservation.	211915 (C Newell)
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## Policy GP/SF: Shopfronts

### Abbreviations

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

### Summary of Main Issues:

Comments received expressed broad support for the policy's objective of ensuring that shopfronts contribute positively to local character and distinctiveness. Respondents supported the protection of historic shopfronts and their contribution to the area's heritage and townscape.

Comments were made seeking stronger controls on illuminated displays and shopfront lighting. Concerns were raised regarding the increasing use of bright, flashing and excessive LED lighting, with respondents highlighting potential impacts on visual amenity, energy consumption, street safety and the wellbeing of people with neurological and neurodiverse conditions. It was suggested that the policy should include measures to limit light spill and ensure lighting remains proportionate to its surroundings.

Concerns were raised that a uniform approach to shopfront design may not be appropriate in rural areas. Respondents emphasised the need for village-scale retail development and shopfronts that reflect local character, avoiding urban commercial forms that could detract from rural identity. Historic England considered more could be done to encourage the restoration and reinstatement of historic shopfronts.

Overall, respondents supported the policy direction while seeking stronger controls on lighting and signage, continued protection of historic shopfronts, and a more locally responsive approach to shopfront design in rural communities.

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

The Councils note the support expressed for the protection of historic shopfronts and the representations seeking stronger policy protection for traditional and historic shopfronts, including the restoration and reinstatement of historic features and greater recognition of the contribution that heritage can make to the vitality and character of centres.

In response, the policy has been strengthened to provide greater protection for traditional and historic shopfronts. The revised policy introduces a clearer presumption against the removal of traditional shopfronts that are appropriate to the building or are of architectural or historic significance in their own right. Additional wording has also been included to ensure that the replacement of traditional shopfronts within Listed Buildings and Conservation Areas will only be permitted where the existing shopfront is inappropriate and the replacement would improve the character of the building or area.

The Councils note comments relating to illuminated displays, light spill and excessive shopfront lighting. While these concerns are recognised, they are considered to be more appropriately addressed through the shopfront guidance appendix, advertisement consent and other design and amenity policies. As such, no amendments have been made to the policy in this regard.

Comments relating to active travel, bridleway access and village-specific retail provision are also noted. However, these matters are either outside the scope of this policy or are considered to be adequately addressed within other local plan policies or through the policy's existing requirements for shopfronts to respond positively to the character, scale and appearance of their local context.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support the protection of historic shopfronts	204194 (Cambridge Past, Present and Future)
Can anything be done in this Local Plan to reduce (or, better still, eliminate) the use of flashing, bright illuminated displays. These are a distraction for those concentrating on street-safety/surveillance (for themselves, or for children or other vulnerable individuals in their care). They can also be distressing (if not actually downright dangerous) for those with some autistic, epileptic and other neurological or neurodiverse characteristics. This request also applies to bus stops, and to stand-alone signage on pavements and in 'pedestrianised' areas	202537 (J Neal)
This policy should include a requirement to limit the light spill from shop fronts which has become an issue in the high street in the last few years with new shops using excessive LED lighting that is disproportionate to the streetscape at night and consumes more energy than is necessary.	204938 (Mothers CAN Cambridge)
Rural Active Travel routes and PROWs should be bridleways so that horseriders are included and can visit shops and cafes	204032 (S Rogers)
Girton does not currently have traditional shopfronts, but it does have strong community interest in local retail, small enterprise, and village-scale business. Shopfront policy must therefore support future village-appropriate retail, not urbanised frontages. Survey data shows strong support for local retail and small businesses. Village identity requires a rural, modest, contextual approach. Any future shopfronts must avoid urban commercial typologies. GPC Requests to the Local Plan: Support village-appropriate	202243 (Girton PC)

<p>retail units with modest rural shopfront design; Avoid imported urban high-street forms; Ensure any shopfront proposals respect village scale and character.</p>	
<p>We welcome the reference to historic shopfronts in this policy. The policy could go further and encourage the restoration and reinstatement of historic shopfronts. This is both in terms of the positive contribution historic shopfronts make to the character of an area, but also the economic benefit of providing traditional and bespoke shopping units to shop owners.</p> <p>Our recent High Street Heritage Action Zones across the country are unlocking the potential of high streets, fuelling economic, social and cultural recovery and breathe new life into it for future generations.</p> <p>The Policy should make more reference the role of heritage in the re-vitalisation of retail areas.</p>	<p>210179 (Historic England)</p>