

Consultation Statement

Appendix 14: Response to Representations - Infrastructure



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

Infrastructure

Infrastructure Introduction

Abbreviations

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

Summary of Main Issues:

Responses to the Infrastructure chapter were generally supportive of the positive approach set out in the Local Plan to infrastructure planning, as well as various key principles established in its policies, including vision-led transport planning and the prioritisation of active travel and sustainable travel modes. Some suggested that sustainable food should be added as a cross-cutting infrastructure category alongside transport, water, homes, energy and green space.

A range of concerns were raised in relation to identified capacity shortages and gaps in existing infrastructure, and negative experiences when using various infrastructure in Greater Cambridge. In particular, congestion and unreliable bus services were highlighted in a number of responses. Various challenges were identified in relation to the pressure that the growth levels and

specific strategic allocations proposed in the Local Plan would place on infrastructure, including water, roads, wastewater treatment, flood risk mitigation measures, energy and healthcare facilities. Specific concerns were raised about pressure arising from other developments not identified in the Local Plan, including data centres, and sought to understand how the Local Plan has considered cumulative impacts of different proposed allocations and in combination cross-boundary developments (such as Universal Studios or proposed new town at Tempsford) on infrastructure.

Various responses requested that the Local Plan and its evidence do more to meet specific infrastructure needs, including emergency services, cultural facilities, youth and community centres and measures to address digital poverty. Some suggested that the Plan should focus more on addressing current infrastructure capacity gaps, including in rural areas. Several respondents expressed concern at the absence of a Transport Strategy in support of the Local Plan.

There were a number of comments raised about specific planned infrastructure schemes in Greater Cambridge, with a particular focus of various comments on the East West Rail route. Others highlighted alternative options for infrastructure improvements, such as the reopening of the Haverhill railway as an alternative to the planned busway. Hertfordshire County Council and West Suffolk Council highlighted the importance of cooperating on cross boundary matters.

A range of comments were raised in relation to the wording of different Infrastructure policies, with recurrent themes around the specificity and clarity of key terms and thresholds, cross-references to the strategies, policies and priorities of other public sector bodies and authorities, and the need for greater clarity around how infrastructure will be introduced in a timely manner to support the phasing of developments. Some comments requested the Local Plan go further and establish firmer requirements and/or mandatory standards, for example in relation to requirements around sustainable transport provision, the permeability of sites, and

creating walking and cycling links. Other comments, however, sought greater flexibility in the policies, such as in relation to the requirements of specific sectors or around how requirements might be applied in different contexts.

Response to the main issues raised in representations

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

The Councils recognise the significant strength of feeling expressed on the need for effective, coordinated and timely infrastructure planning and delivery to support future development of the area. The proposed strategy for growth is predicated on various key infrastructure projects being delivered ahead of development to ensure there is sufficient capacity across the area, including planned transport and water infrastructure schemes, and we have strengthened a number of our policies, including our strategic site allocation policies, to limit development from coming forward until such major constraints are resolved and to ensure that infrastructure is delivered in a timely way to support phased development.

In general, the spatial strategy focuses development where it is capable of being served by existing or new infrastructure, as opposed to a more dispersed development strategy. Opportunities to deliver growth in and on the edge of Cambridge are accompanied by further development in existing and planned new settlements. These are of a sufficient scale that they can viably support substantial contributions to infrastructure, and the Plan establishes clear requirements to ensure that they address their own infrastructure needs and ensure the delivery of key infrastructure and services in-line with development, to avoid pressures on other local facilities. This includes in neighbouring authority areas, and the Councils will continue to work with all neighbouring local planning authorities on the infrastructure requirements arising from planned growth proximal to its boundaries, to identify the potential need for cross-boundary infrastructure.

Identified capacity pressures on infrastructure are acknowledged, and the Council has taken a proactive approach to identifying where such constraints exist, what improvements will be needed to address these and how planned developments could contribute; noting we can only seek funding for infrastructure from development which is necessary to make the development acceptable in planning terms, is directly related to the development, and is fairly and reasonably related in scale and kind to the development. The Council's Infrastructure Delivery Plan (IDP) has been developed using an evidence-led methodology that evaluates current infrastructure capacity and increased demand resulting from planned housing and commercial development, identifying a range of infrastructure measures working closely with delivery stakeholders.

A further update of the IDP was commissioned following the Regulation 18 consultation on the Draft Local Plan, as well as further, detailed studies which provide additional evidence on specific infrastructure needs, including cultural infrastructure, community facilities and food growing. We are working closely with public sector partners to understand their own infrastructure needs, priorities and strategies and identify how development might contribute, including with: the emergency services; the County Council (with respect of services such as education and waste); and the Central East Integrated Care Board and local NHS trusts, to ensure alignment between emerging plans for neighbourhood health hubs and planned growth across the area. This work is also expected to expand upon and develop the evidence around healthcare infrastructure provision which will likely include acute and secondary healthcare facilities, including hospital infrastructure.

The IDP is a live document and will continue to be updated regularly as the Local Plan progresses to reflect changes in infrastructure planning, funding availability and stakeholder input. This will involve further engagement with infrastructure providers and other stakeholders to identify the potential impact of demand arising and additional specific infrastructure needs to support the development strategy and site allocations proposed.

Following a period of close working between the local planning authority, transport authority and local highways authority, the Cambridgeshire and Peterborough Combined Authority has published a draft interim Greater Cambridge Transport Strategy alongside the Proposed Submission Local Plan, and is committed to adopting a final Strategy in time to support the submission of the Local Plan. The draft interim Transport Strategy identifies transport measures for the area, including proposed solutions to address the severe congestion challenges experienced in Cambridge. In combination, these site specific and strategic measures demonstrate that the sites included in the plan can be delivered. The final Transport Strategy will be adopted before the Local Plan is submitted for independent Examination. Alongside this, the Councils will update the IDP to reflect the final strategy once relevant information is confirmed and shared. Additionally, further evidence has been prepared to understand the cumulative effects of planned growth sites and identify where further mitigation may be needed; for examples, potential in-combination transport impacts of planned development in the A14 corridor and at Cambourne North.

The range of comments on the focus, framing and effectiveness of the Plan's policies on infrastructure are noted. These have been afforded further consideration in relation to the relevant policies, addressed elsewhere in this Topic Paper. While noting the concerns raised around the design and routing of the EWR and GCP corridor schemes, these are matters for their respective delivery bodies, the East West Rail Company and the Greater Cambridge Partnership.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
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<p>Multiple distribution centre proposals between Girton and Boxworth on the A14 will add large numbers of HGVs and smaller vehicles onto a congested road which is prone to accidents. Mitigation will be needed to avoid defeating the economic imperative. Concern that proposed development at Cambourne North and EWR station will lead to further congestion and increase traffic on narrow local roads between the A428 and the A14, including through villages of Boxworth, Elsworth, Dry Drayton, Knapwell and Madingley. The Plan should consider a new road to connect the A428 with the A14.</p>	<p>205421 (W East), 201305 (A Mansey), 205398 (A East)</p>
<p>We approve of the housing and infrastructure changes but have concerns over EWR, specifically the route it's taking. We used to live in Northstowe and would really have liked a station there. The southern route however goes very close to lots of villages, without providing them any benefit or access to stations</p>	<p>201364 (R Earl)</p>
<p>I reside in Boxworth. Village road carrying too much traffic now. Very concerned that no one has assessed combined effect of EW Rail and new station nr Knapwell plus Cambourne North plus logistic developments at Cambridge Services and Bar Hill plus further new housing north of A14 etc. A14 junction 24/24A is poorly designed and lacks capacity; Swavesey South roundabout is undersized and even now traffic has trouble leaving from Boxworth/services at peak times. Similarly, no assessment of additional strain on water, sewage, flood risk as water is sent via Swavesey to the Great Ouse. I seriously doubt we'll cope.</p>	<p>201493 (P Rainey)</p>
<p>My concern about sustainability is that information and forward planning on basic issues such as roads and transport are not yet available. In particular areas of intense concentration of development such as North Cambourne the local roads are not suitable for the current volume of traffic, will be under huge</p>	<p>202189 (M Stevenson)</p>

<p>pressure with the new station at. Cambourne, never mind what will happen once the house building starts.</p>	
<p>Share concerns very concerned that there will not be enough water to support the very high level of growth planned for Greater Cambridge; plus and making it a centre for water thirsty AI data centre growth.</p>	<p>205296 (Federation of Cambridge Residents' Association)</p>
<p>The A1307 route into South Cambridge from the east should have been implemented long ago and the alternative of cutting through virgin green belt is more expensive and more damaging to the environment. I have not heard a logical argument in favour of the green belt route.</p>	<p>202730 (D Grey)</p>
<p>Concern at the lack of a completed transport plan / strategy in support of the Plan.</p>	<p>202730 (D Grey), 205398 (A East), 210793 (C Deer)</p>
<p>I support Cambridge Junction and Create Cambridge in asking that:</p> <ul style="list-style-type: none"> • cultural infrastructure is embedded across strategic chapters, not confined to Wellbeing • culture is treated with parity alongside housing, transport and utilities as core civic infrastructure • 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. <p>This reflects how cultural venues function in practice and ensures consistent delivery across the plan.</p>	<p>202068 (H Chamberlain), 202154, 202321, 202900, 20294 (Cambridge Junction), 202209 (H Tam), 202403 (J Webber), 202422 (T Shaw), 202432 (Kettle's Yard), 202473 (K Jones), 202695 (T Altmann), 202725 (W Townsend), 202769, 204200, 205437 (Cambridge Junction / Create</p>

	<p>Cambridge), 202947 (R Tarry), 202962 (T Flinders), 203375 (N Ellis), 203456 (S Ashworth), 203496 (L Heap), 203650, 203882, 205088 (University of Cambridge), 203860 (N Yeni), 204419 (New International Encounter), 204878 (L Matthews), 205153 (H Paterson), 205232 (J Walsh), 205382 (L Howse), 205386 (N Oakley), 205450 (A Seiglow), 203036 (The Arts Theatre Cambridge)</p>
<p>HCC are simply highlighting plans and strategies in Hertfordshire that could impact and may assist in mitigating the impact of development on infrastructure, particularly the transport network, both sides of the county border. This includes Local Transport Plan, growth and transport plans around the A505 corridor. Highlight the importance of cooperation on transport matters.</p>	<p>204074 (Hertfordshire County Council)</p>

<p>The overall level of growth planned for Greater Cambridge and in particular these two planned developments, Cambridge east (S/CE) and Grange Farm (S/GF), will require a strategic transport assessment to consider the cumulative impact on the highway network and highway safety in particular on the A14, A11 and A1307. West Suffolk will engage in collaborative working to fully understand how this will be assessed, what the infrastructure requirements are and any mitigation of impact in particular on Haverhill, in the context of the A1307 and its capacity. This in particular will require careful consideration of the impact on commuting traffic travelling from Haverhill to Cambridge and the A14.</p>	<p>204862 (West Suffolk Council)</p>
<p>Additional housing will exacerbate road congestion in Cambridge, as shown by the hour and a half bus journey from the town centre to Cherry Hinton, and will increase traffic-related pollution. Many residents rely on cars for work and for transporting heavy luggage, so incentives to walk or cycle are unlikely to reduce car use.</p>	<p>209166, 208613, 208614 (R Smith),</p>
<p>Introduce mandatory permeability standards based on site size. Walking and cycling connections should be required, not optional.</p>	<p>202511 (H Brown)</p>
<p>I don't think that a lot of places that people walk for pleasure are public rights of way but are instead either informal tracks used without permission. Perhaps these could be upgraded?</p>	<p>202704 (S Berridge)</p>
<p>CPCA's Statement of Intent (September 2025) states its Greater Cambridge Transport Strategy (GCTS) will be approved by December 2026. The CPCA cannot confirm its position on Transport policies or the Transport Mitigation Measures until the GCTS is finalised. The Mayor has set out his ambitions for a light rail system for Cambridge through the 'Get Cambridgeshire and Peterborough Moving' initiative, and light rail is a key element in this. The CPCA therefore requires the Plan to consistently refer to</p>	<p>205404 (Cambridgeshire and Peterborough Combined Authority)</p>

<p>'high-quality public transport corridors', including within site-specific sections, as the most appropriate mode for each corridor has yet to be determined.</p>	
<p>GCSP's Local Plan says its overarching objective is sustainable development, targeting to add 73,300 jobs and 48,195 homes by 2045 – equivalent to a second Cambridge City next to the existing one. GC is under serious water stress now, it is urgent to provide new water infrastructure (but none anticipated before 2032) and reduce current demand (how effective are proposed measures). With uncertainties, risks, lack of control over timing, costs and deliverables we believe the LP's water plan is not sustainable. We are similarly concerned on transport, wastewater, energy, healthcare, and on significant additional growth pressure from Government and CGC.</p>	<p>203656 (Cambridge Approaches)</p>
<p>EEAST welcomes the proposal to work with the health sector, and this should include emergency ambulance services. The ICS Estates Strategy does not provide many details of the estate and other requirements for emergency ambulance hubs as this is managed by the lead commissioning ICS. Therefore, direct communication with EEAST is required. EEAST would request:</p> <ul style="list-style-type: none"> • A full Health Impact Assessment covering all NHS services including ambulance capacity • Assessment of travel time from ambulance stations to the site during peak congestion, as this directly affects Category 1 and 2 compliance. 	<p>210338 (East of England Ambulance Service NHS Trust)</p>
<p>Universal Studios site in Bedfordshire- EEAST would recommend consideration of the impact of additional car travel arising from visitors travelling to the proposed Universal Studios site in Bedfordshire. More traffic is expected on major routes, including A14, A421/A428. Increased rail usage may also arise as a result of this development.</p>	<p>210341 (East of England Ambulance Service NHS Trust)</p>

<p>ECC expect Greater Cambridge councils to ensure the necessary highway and transportation assessments, with mitigation requirements and provision arising from the spatial strategy and new developments identified, including impacts on both the local and wider highway and transportation network. With consideration given to cross boundary impacts and needs associated with any growth proposals. ECC recommends that emphasis is placed on promoting integrated sustainable transport; with sustainable travel plans and passenger transport options in new developments and the connectivity between housing and employment areas to ensure an integrated transport package of solutions are developed. This is particularly important for the larger sites that may offer an opportunity for a step change in provision and in some cases will link to, or even place a burden on, services and facilities in neighbouring authorities.</p>	<p>210468 (Essex County Council)</p>
<p>Support for Policy I/EV's vehicular and cycle parking standards and design requirements. Request to update Part 2h to allow for cycle parking in alternative residential types, such as flats or maisonettes, by including provisions for communal secure areas. Concerns regarding the vagueness of the 5-10% requirement for non-standard cycle parking in Part 3; request for a defined threshold and specific types of non-standard cycles to be accommodated. Request for clarification on the threshold for large-scale major developments regarding the submission of a site-wide electric vehicle charging strategy as stated in Part 6.</p>	<p>204467 (Cambridge Investment Partnership)</p>
<p>The respondents object to Policy I/EV, advocating for a design-led approach to parking provision that considers site location, use types, and safety issues. They suggest encouraging innovative car parking solutions and the inclusion of electric charging points, tailored to the specific characteristics of individual sites. Part 1 of the Policy is seen as inflexible, requiring Transport Assessments for all developments,</p>	<p>203122 (Barrat David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>

<p>which should instead adopt a site-specific, evidence-based approach.</p> <p>Part 2 of the Policy is viewed as overly prescriptive regarding cycle parking design, suggesting that flexibility is necessary.</p> <p>The respondents recommend that any requirement for electric vehicle parking be excluded from the Policy, as it is already covered by Building Regulations.</p>	
<p>Policy I/EV outlines the proposed parking standards that are to be applied to new developments. Accordingly, the draft Policy provides guidance with regards to the design considerations to inform car and cycle parking provision, as well as the quantitative parking standards to be applied. Whilst the proposed parking standards are considered to be acceptable in principle; the draft Policy text is lengthy and consideration should be given as to whether it may be appropriate to include reference to the compliance with the parking standards within the parking text with the parking standards themselves instead provided within an appendix to the Local Plan or alternatively within a separate Parking Standards Supplementary Planning Document</p>	211293 (Woolsington One Ltd)
<p>The respondent objects to Draft Policy I/SI, particularly the designation of land southwest of Comberton on the Policies Map, which is subject to the East West Rail Safeguarding Direction. The respondent accepts the wording of Draft Policy I/SI in principle but strongly opposes the identification of the land under Policy I/SI due to its implications for their site. The respondent has a legal interest in the land through an Option Agreement with the landowner and has made formal representations to East West Rail during the Non-Statutory Consultation. The respondent is concerned about the proposed alignment of the East West Rail track and its use of their site as a construction compound, and they are in discussions with the EWR Company to address these issues. The respondent requests that</p>	204555 (Bellway Strategic Land)

<p>designations under Policy I/SI on the Policies Map be updated before the Regulation 19 Consultation to reflect the latest developments with East West Rail.</p>	
<p>The respondent seeks clarification on the plan-making and decision-taking role of Policy I/SI, particularly regarding the application of safeguarding for the East West Rail scheme. While the principle of safeguarding is accepted, the policy lacks clarity on acceptable development circumstances within safeguarded areas. The supporting text suggests consultation with National Highways and/or East West Rail is required, but does not specify when development may be permissible. The current wording of the policy may lead to an overly restrictive interpretation of safeguarding, creating uncertainty. The respondent recommends amending Policy I/SI to clarify that safeguarding does not imply a presumption against development and to provide clear criteria for proposal assessments. The suggested amendments should include the role of consultation, opportunities for design mitigation, and specific circumstances where development may be supported. Without these clarifications, the respondent believes the policy lacks precision and may be ineffective and unsound.</p>	<p>204146 (Emmanuel College)</p>
<p>ECC acknowledges the reference to the Infrastructure Delivery Plan (IDP) accompanying the Local Plan. It is however notable that following a review of the IDP there is no reference to cross boundary matters, and the anticipated priorities for the future. For instance, strengthening links to London Stansted airport from future employment and housing growth locations, in particular through sustainable modes (including but not limited to rail). ECC also draw attention to our previous comment that highlights the matters for consideration within the Highways and Transportation evidence base.</p>	<p>210470 (Essex County Council)</p>
<p>ECC aims to assist Greater Cambridge authorities in drafting the emerging Plan and therefore draws attention to the Uttlesford Inspectors Report and Main Modifications that is published (links provided).</p>	<p>210476 (Essex County Council)</p>

<p>The inspectors and main modifications include an addition of policy regarding the approach to noise exposure. It recommends the addition - “for aviation transport sources, the Significant Observed Adverse Effect Level is considered to occur where noise exposure is above 63dB LAeq,16hr (57dB LAeq,8hr at night) and the lowest observed effect level is considered to be 51DB LAEQ, 16HR (45DB LAEQ, 8HR at night)”. This wording may be appropriate for the Plan.</p> <p>Furthermore it is also important to note that the Inspectors for Uttlesford also welcomed the addition of reference to outdoor noise on school sites should not exceeding 55DB LAEQ (30 MIN) (reference from the Main Modification - MM32). Similarly to the above, Greater Cambridge authorities may seek to adopt a similar approach.</p>	
<p>The need for aggregates, required for building the proposed new developments, could have an impact on available supplies, and their transportation, for development in Suffolk. Such matters may need to be given further consideration as the plan progresses and as more detailed information becomes available.</p>	210637 (Transport 2000 Cambs & W Suffolk)
<p>ECC is keen to inform, shape, support and help refine development strategy and policies, given the potential cross border impacts for ECC and involvement is necessary and beneficial:</p> <ul style="list-style-type: none"> • Highway and Transportation Authority, including responsibility for the development and delivery of the Essex Local Transport Plan; lead authority for Education including Early Years and Childcare (EYCC), Special Education Need (SEN) and Disabilities, and Post 16 education; Minerals and Waste Planning Authority; Waste Disposal Authority; LLFA; lead advisor on public health; and has responsibilities for adult social care in relation to the securing the right housing mix which takes account of the specialist housing needs of older people and adults with disabilities; 	210465 (Essex County Council)

<ul style="list-style-type: none"> • infrastructure funding partner which seeks to ensure that development proposed is realistic and does not place an unnecessary (or unacceptable) cost burden on the public purse and, specifically, ECC's capital programme; • major provider and commissioner of a wide range of local government services throughout the county, many of which are accessed by those who reside in adjoining authorities. 	
<p>The policies should be strengthened to include: references to lighting and cameras in relation to active travel; clearer criteria to secure shops, youth and community centres at an earlier stage of the build to encourage new community development and to stimulate social capacity at an early stage; reference to digital poverty in relation to Digital Infrastructure. S106 money delivery needs to be standardised and made easier to access.</p>	<p>210536 (Cambridgeshire County Council)</p>
<p>Need for greater focus on delivering communities facilities (education, schools, libraries, healthcare, community centres and halls, culture, faith spaces, youth spaces) up front, to encourage community development, stimulate social capital and provide alternative spaces for the first residents.</p>	<p>210537 (Cambridgeshire County Council)</p>
<p>Request to ensure accurate references to Cambridgeshire County Council strategies are accurate. The Plan should also include references to: the requirement for developers to submit Transport Assessments; Rights of Way Improvement Plans (ROWIP) (https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/rights-of-way-improvement-plan) where connectivity/community & social inclusion is discussed, noting there is already a network that can be built upon or improved for this. The Royston to Granta Park Strategic Transport Study should be referred to in relation to the southern biotech cluster.</p>	<p>210523, 210559 (Cambridgeshire County Council)</p>

<p>There is a need for a effective public transport serving a wide range of destinations, with more effective planning for and investment in public transport. Large amounts of money have been wasted encouraging people to drive to car parks before taking short guided bus journeys. The Council should plan ahead more effectively to encourage much more efficient development and infrastructure.</p>	<p>206546 (A Gresham)</p>
<p>In the medium to long term, a railway or tram line from Haverhill into Cambridge with appropriately placed stations would be a more efficient solution than a busway.</p>	<p>206547 (A Gresham)</p>
<p>Aside from traffic generation from development sites, when land is allocated within proximity to the SRN, the increased number of residents will likely be impacted by noise pollution from the SRN. National Highways will not allow noise barriers, and other structures on its land. In addition, National Highways will not accept third party connections to its drainage systems as highlighted within paragraph 59 of the Circular 01/2022. Paragraph 59 also states that developments must not add extra run off to existing systems where existing informal or formal connections exist.</p>	<p>209013 (National Highways)</p>
<p>In addition to this, due to the proximity of allocations around the SRN, some locations may result in potential severance issues. Consequently, provision needs to be accounted for infrastructure, such as overbridges, to minimise severance across settlements and new developments. As stated above, any crossings of the SRN will be subject to the correct structural and safety assessments completed and appropriate agreements ensuring ongoing maintenance and required funding are met. Once any requirements for additional crossings of the SRN have been established, National Highways recommends engagement with appropriate teams.</p>	<p>210848 (National Highways)</p>

Add an explicit 'Sustainable Food' theme as a cross-cutting infrastructure category alongside transport, water, homes, energy and green space	206960 (Y Dignon), 208190 (Cambridge Sustainable Food)
Previous mistakes in how Cambourne was planned should not be repeated in future development, including the lack of a high street with smaller shops, facilities for young people and a swimming pool. This should be provided up-front.	201853 (R Logan)
Welcome the emphasis on sustainable transport but the strategic priority for the chapter should include a greater focus on people and how people are served by transport.	203753 (Cambridge Green Party)
Supportive of the commitment to vision-led transport planning.	204922 (Innovate Cambridge)
Fire and rescue, police and ambulance services should be referenced under the strategic priority for infrastructure policies.	207518 (Cambridge Fire and Rescue Service)
Large-site allocations present a significant opportunity for sustainable travel, but walking, cycling, and public transport must be prioritised from the beginning.	207540, 205435 (R De Beaux)
In planning for the area, the Council should safeguard existing NGET assets including overhead lines, underground cables and substations, and existing and potential access routes required for the delivery and removal of equipment associated with the construction, replacement and maintenance of transmission-scale equipment; and support future network reinforcement and expansion works. Council should encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.	208042, 208043, 208044, 208045, 208046 (National Grid Electricity Transmission)

<p>CLAF supports the overall vision of the Draft Greater Cambridge Local Plan but urges stronger, more explicit policy commitments to protect, enhance and integrate public rights of way and access networks across Greater Cambridge.</p> <p>Essential that PROWs and other access networks recognised and safeguarded as core infrastructure. Relevant policies should include wording to prevent loss, severance or compromise of PROWs, and any development resulting in alterations should deliver like-for-like or improved access for different users, recognising how important these links are in rural areas.</p>	208162 (Cambridgeshire Local Access Forum)
<p>The Plan should be more infrastructure-led to avoid issues as a result of scale of growth, clearly defining phases for large schemes.</p>	202210 (Storeys Way Residents Association)
<p>The Plan should include clearer requirements for required infrastructure to come forward as agreed (and early in the development process).</p>	203606 (Cambridge City Council Liberal Democrat Group)
<p>The Plan lacks sufficient focus on existing problems in the City of Cambridge – including the volume of traffic, narrow pavements, and poor bus services.</p> <p>There seems to be little effort to actually change anything substantive. So I find it hard to take all the stated commitments to sustainability seriously.</p>	201032, 205513 (T Pfaff)
<p>Need to demonstrate more clearly how cumulative impacts of development on infrastructure will be addressed.</p>	207381 (R Baker)
<p>Notes that proposed buildout rate means provision of infrastructure will be a long time coming.</p>	210793 (C Deer)
<p>Need to improve public transport so there is less need for people to use their cars; rather than just making it more difficult to drive.</p>	201153 (B Raynaud)

<p>The Plan is too focused on improving bus services and needs to make reference to the need for Mass Rapid Transport (MRT).</p>	<p>201266 (A Duff)</p>
<p>The Plan must prioritise public transport and active travel over electric cars, which still cause congestion and road safety issues. The focus should be on improving bus services, not just infrastructure.</p>	<p>203119 (S Hughes)</p>
<p>The Plan includes lots of focus on major transport schemes and corridors, but less focus on everyday rural infrastructure and cumulative impacts on this – including roads, drainage, school capacity, healthcare, reliable digital infrastructure. Should be more focus on smaller settlements and providing necessary rural facilities.</p>	<p>203181 (Cambridgeshire ACRE)</p>
<p>The Universal Studios development should be included in the evidence base, with transport impacts modelled and mitigated. Similarly, the Plan's evidence base will need to take account of the proposals at Tempsford and their impacts on transport and housing / employment demand through robust modelling.</p>	<p>208224, 208225 (Bedford Borough Council)</p>
<p>The Topic Paper has not been updated following the Government announcement of funding withdrawal to support the Cambridge WWTW relocation. We generally support Anglian Water's view that the Local Plan consider safeguarding land for new infrastructure that they may need to provide to support development.</p>	<p>211186 (Environment Agency)</p>
<p>In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, the joint Local Plan for Greater Cambridge should include at future stages of the Local Plan, policy wording that makes clear that only those applications for development which would not compromise, restrict or</p>	<p>209251 (Defence Infrastructure Organisation)</p>

<p>otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.</p> <p>The MOD asks that the plan contain clear safeguarding language is used to prevent any development – including tall buildings, wind turbines or large solar-PV installations – from compromising the operation of defence assets such as the East Wide Area Multilateration network and aviation safety, and that any proposals that would do so be refused or subject to conditions.</p>	
<p>Active Travel routes and PROWs should be bridleway to include horseriders. New developments should have perimeter bridleways and bridleway connections to/from other nearby places.</p>	<p>204072 (S Rogers)</p>

Policy I/ST: Sustainable transport and connectivity

Abbreviations

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

Summary of Main Issues:

There was broad support for the vision-led approach and principles set out in the policy, noting that development of separate dedicated public transport links where public transport is unaffected by general traffic congestion are essential for growth, and that the strategy should reflect this more fully by directing growth towards the most sustainable, well-connected villages, or on the edge of Cambridge. Some comments noted a mismatch between the principles set out in this policy and the sites chosen for development, suggesting that they actively avoid existing sustainable travel infrastructure and, in some cases, are in close proximity to major roads. Some comments suggested that rather than restricting development in areas with lack of sustainable transport, the plan could be more ambitious in supporting enhanced rural connectivity, and that the plan doesn't do enough to connect some settlements to high quality sustainable transport, including existing and planned stations. Some suggested the inclusion of specific transport measures for individual villages or to address site specific concerns. Some comments that infrastructure improvements and their timely delivery are vital to avoid delay to the build out of development.

Comments reflected that the policy should support widening of travel choices and support genuine choice of modes, indicating the need for greater balance given all modes play a role, and suggesting that the policy should require proposals to adhere to the sustainable travel hierarchy. Some indicated that achieving a mode shift away from car requires the provision of well-designed public transport systems, walking and cycling routes and infrastructure. Others suggested that the key requirements

in the policy could be made more specific and measurable, seeking general clarification, with various respondents requesting the inclusion of mandatory permeability standards based on site size.

Various commented that walking and cycling connections should be required not optional. Some suggested that opportunities should be sought to maximise the provision of new active travel routes, and that the policy should embed the five active travel design principles – coherent, direct, safe, comfortable and attractive, recognise the need for active travel connections for leisure and recreational purposes, including equestrian users, and seek improvements appropriate to the nature of the route. Some comments sought clearer definition of key terms, such as what was meant by the use of the ambiguous term “Rights of Way”.

A number of comments suggested that the policy could go further in emphasising the role of buses, facilitating direct and efficient bus operation, and supporting improved bus services, noting a lack of a comprehensive strategy to enhance the bus network. Concerns were raised about the impact of specific planned transport schemes including GCP busways and EWR, and the closure and relocation of Waterbeach railway station, and that the Plan should establish mitigation principles and safeguards to maintain village character and cohesion. Comments that the existing and planned busways are not integrated or joined up, and that an integrated mass rapid-transit (MRT) network is needed to support the scale of growth as an urgent priority, extending beyond Greater Cambridge and that the Local Plan should facilitate its delivery.

Comments suggested railway stations need access strategies and better active travel and bus connections and wayfinding to surrounding villages, and noting that barrier down times are deterring passengers and need mitigation.

Concerns were raised that there is disproportionate emphasis on reducing car use, while underplaying factors such as cleaner vehicle technology and hybrid and electric transition, realistic travel distances in dispersed communities and the economic and social costs. Some commented that the policy could be clearer around how trip budgets will be enforced and what the legal

basis is for doing so.

Some comments suggested that electric cars should not be considered a form of sustainable transport, which is contrary to the vision to minimise reliance on the private car, noting electric private cars have the same impacts on congestion and road safety. Concern was expressed about the impact of HGV traffic volumes and the lack of available HGV parking. Some reflected that the transport needs of certain development, such as freight and logistics, are likely to be different, with the need to balance strategic location and strong sustainable transport measures. Concern that the plan does not provide a cumulative impact assessment for four proposed logistics sites, and a lack of traffic forecasts makes it hard to evaluate access and mitigation measures, noting issues arising from congestion and rat-running in the surrounding area.

Further issues raised include that the Plan should reflect recent announcements regarding EWR, including Cambridge Station Eastern Access, Cambridge East Station and Cambourne Station, that there should be clearer references to the requirement for developers to submit Transport Assessments, and it could be useful to refer to the Royston to Granta Park Strategic Transport Study when talking about the southern biotech cluster.

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

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

The development strategy co-locates the majority of development with existing or planned high quality public transport schemes, such as East West Rail (EWR) and proposed GCP public transport corridor schemes; this will widen travel choice and support genuine choice of modes for new and existing residents and workers, improving inclusivity and helping to reduce the reliance on the private car. High quality public transport requires a significant concentration of people to achieve patronage levels and ensure

they are viable; substantial development at villages to sustain such provision needs to be balanced against wider potential harms. Development will be phased to ensure it keeps pace with the delivery of necessary transport (and other) infrastructure, to avoid harmful impacts (including cumulative impacts) on the wider transport network. It is acknowledged that new public transport proposals continue to be explored, including the potential for an area wide mass rapid transit scheme, however it is not appropriate to include these within the plan until there is greater certainty of their delivery.

There were suggestions for inclusion of specific transport measures for individual villages or to address site specific concerns. These are matters for the Greater Cambridge Transport Strategy (GCTS), and as such have been shared for consideration with the Cambridgeshire and Peterborough Combined Authority for their consideration. However, reflecting the consensus of responses around particular types of transport measures, such as missing connections between villages and nearby stations and mobility hubs, focused changes have been made to the policy to identify general transport network connections that new developments could meaningfully address or contribute towards.

Concerns were raised in relation to the impact of EWR and GCP corridor schemes; these are matters for their respective delivery bodies, the East West Rail Company and the Greater Cambridge Partnership, and the Councils are engaging with these delivery bodies to ensure these schemes minimise and mitigate their impacts in accordance with environmental and place making policies in the Local Plan and maximise the benefits and opportunities for local communities, for example through improved connectivity. Noting concern was expressed about HGV traffic and parking, the policy requires development to assess and mitigate their impacts, and Policy S/RRA/SCS: Land to the south of Cambridge Services, A14 makes provision for approximately 150 additional HGV spaces.

It is accepted that all modes play a role in addressing the travel needs across Greater Cambridge and the policy has been

amended to ensure it addresses each, including strengthening the public transport wording and adding clarification the text in relation to new roads and accesses. Other changes include refinement of the criteria relating to active travel to embed the five active travel design principles into the policy and recognise the use of routes for recreational and leisure purposes, including equestrian users, seeking to create a joined-up network of routes. Further clarifications have been made around how key terms are defined, including “Rights of Way”, and to address concerns that the policy should be made more specific and measurable, noting that the policy applies to all types, scales and locations of development.

In response to concerns that there is a disproportionate emphasis on reducing car use over wider factors such as cleaner vehicle technologies, whilst this is noted, it should be recognised that cleaner vehicle technologies the policy is consistent with the road user hierarchy which prioritises vulnerable road users and sustainable modes ahead of cars. New strategic sites on the edge of Cambridge and new settlements will be designed to prioritise movement by non-car modes to be more inclusive and reduce the reliance on the car through provision of substantial improvements to active and public transport to provide genuine travel choice and due to constraints on the already congested highway network; this will be achieved through vehicular Trip Budgets, which will be enforced through a monitor and manage approach to ensure that the development remains within the agreed trip budget for the site throughout its delivery.

In response to the specific comments raised in relation to Public Rights of Way (PROW), while the Councils recognise the important role that they play in delivering the Local Plan’s objectives for green infrastructure, sustainable transport and health and wellbeing, including bridleways and multi-user routes, the IDP is intended to identify strategic, costed infrastructure projects required to support planned growth. PROW enhancements are typically delivered through site-specific design, masterplanning and planning obligations, rather than as discrete, plan-wide infrastructure projects. For this reason, they are not identified as a separate costed

infrastructure category within the IDP. The IDP should be read alongside Rights of Way Improvement Plans and other supporting strategies, as referenced in the revised supporting text for the policy, which provide the detailed framework for prioritising and delivering PROW enhancements in a coordinated manner.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We are broadly supportive of this policy.	201647 (Stapleford PC)
The policy should make clear that opportunities should be sought to maximise the provision of new active travel routes (ie, hard-surfaced routes for utility travel) and new 'leisure' routes comprised of PROW (ie, soft-surface routes that provide enhanced countryside access).	210612 (Cambridgeshire County Council)
We welcome the ambition to protect and improve existing non-motorised user routes. It should be noted that "improvement" works such as re-surfacing a soft-surface PROW to a tarmac facility, can potentially be damaging to the pre-existing network of PROW. This potentially introduces disbenefits to the established user base and to biodiversity, and so does not always neatly marry with a desire to "protect" the network. Accordingly, the document should acknowledge that improvements to PROW will take place "where appropriate", and in a manner that is sympathetic to the existing nature of the PROW.	210613 (Cambridgeshire County Council)

<p>Public health support the transport user hierarchy promoting active travel above the use of all other vehicles. Public Health recommend that active travel routes and sustainable travel opportunities in developments should:</p> <ul style="list-style-type: none"> • contribute to maintaining, improving and adding to connectivity for pedestrians, cyclists, users of wheeled mobility aids • be well defined, lit, feel safe with natural surveillance wherever possible • respond to the needs of people with disabilities and reduced mobility • maintain, improve and add to rail, bus and community transport connectivity • provide infrastructure to facilitate sustainable transport. 	<p>210609 (Cambridgeshire County Council)</p>
<p>Throughout the Plan, reference is made to 'Rights of Way'. This is not a class of highway and it is ambiguous as to whether the document is referring to public, permissive, or private rights of way. If the Plan is intending to refer to public rights of way, i.e., Public Footpaths, Bridleways, Restricted Byways, and Byways Open to All Traffic, then it should be unambiguous about this and use the term 'public rights of way' - easily abbreviated to 'PROW'. If the reference to 'Rights of Way' is also intended to encompass permissive rights of access or other privately managed routes, then this should be clarified.</p>	<p>210559 (Cambridgeshire County Council)</p>

<p>Mention of active travel but needs reference to lighting, cameras so that learning can be taken from Northstowe bus route antisocial behaviour and thefts.</p> <ul style="list-style-type: none"> • The need for shops at an earlier stage of the build, youth and community centres also to encourage new community development and to stimulate social capacity at an early stage. • S106 money delivery needs to be standardised and made easier to access. • Digital infrastructure does not refer to digital poverty. 	210536 (Cambridgeshire County Council)
<p>Make sure references to strategies are correct e.g. CCC Active Travel Strategy for Cambridgeshire.</p>	210523 (Cambridgeshire County Council)
<p>Response by chair and Vice-chair of Environment and Green Economy Committee</p> <p>While this is not intended to be a transport strategy, the absence of ring roads, dedicated public transport routes through the city centre, and an active travel ring road or strong inter-village connections means the plan does little to reduce reliance on private car travel. New towns are predominantly planned to the north of the city, while most employment opportunities are located to the south, and connectivity—particularly for journeys from the north—is not consistently strong.</p>	211003, 20800 (Cambridgeshire County Council)
<p>Suggested amended/additional wording highlighted in full representations document to improve points 1., 2., 2a., and 2e.</p>	210525 (Cambridgeshire County Council)

<p>The County Council welcomes the continued close working on the Local Plan with GCSP and looks forward to continuing this close working relationship with further development of the Plan and associated transport evidence. Recent announcements regarding EWR including Cambridge Station Eastern Access, Cambridge East Station and Cambourne Station should be reflected in the Local Plan. There should be clear references to the requirement for developers to submit Transport Assessments. It could be useful for the Local Plan to refer to the Royston to Granta Park Strategic Transport Study when talking about the southern biotech cluster.</p>	<p>210510 (Cambridgeshire County Council)</p>
<p>Walking and cycling connections should be required, not optional, and standards should be produced to mandate this.</p>	<p>203885 (J Prince), 205146 (J Grantham), 201703 (M Hickford), 203097 (S Hughes), 204946 (Mothers CAN Cambridge), 204963 (A Brown), 205015 (M Cleminson), 205317 (R De Beaux), 205371 (A Williams), 205445 (P Colledge), 201815 (J Baumberg), 202883 (J Williams), 203310 (A Hoare) , 201815 (J Baumberg), 204694 (R Humphrey)</p>

<p>Introduce mandatory permeability standards based on site size.</p>	<p>205146 (J Grantham), 203097 (S Hughes), 204946 (Mothers CAN Cambridge), 204963 (A Brown), 205105 (B Nicolson), 205317 (R De Beaux), 205445 (P Colledge), 202294 (R MacDonald), 202883 (J Williams), 205371 (A Williams), 203310 (A Hoare), 203719 (A Hofer), 203735 (D Peters), 204050 (K ap Garth), 204546 (D Potts), 204585 (R Hoadley), 201815 (J Baumberg), 201998 (D Langley)</p>
<p>The GC policy accepts that people can only live in smaller villages such as Great Wilbraham if they have access to a car. This policy impacts children, non-drivers and people without a car, consigning them to dependency and social isolation- and is unfair. Rather than prohibiting because of lack of transport, the Local Plan should be ambitious about improving rural connectivity – for example, for Great Wilbraham a rural transport hub in Fulbourn with car and bike parking, a more frequent connecting bus route to the nearby larger villages, safe cycle routes to adjacent villages and support for EV charging.</p>	<p>206560, 203386 (Great Wilbraham PC)</p>

<p>I fully agree with sustainable transport and connectivity goals outlined here. However, the weakness in many developments is connectivity to the surrounding area. The brochures show a community able to walk and cycle within its red line. While the only access is typically a large junction designed for motor car though put. Never something appealing to new residents wishing to walk or cycles. I would like to see mandatory standard for development's connectivity to the surrounding areas. With policy supporting improvement of these connections to minimum safety standards as part of the development's impact mitigation requirements.</p>	<p>201834 (T McKeown)</p>
<p>The existing transport corridor in west Cambridge does not appear to exist yet. If it were developed it should be confined to cycling and walking and take great care to avoid Grantchester Meadows.</p>	<p>200986 (R Howard)</p>
<p>The plan doesn't do enough to connect some settlements to high quality sustainable transport such as busways, railways or other frequent public transport connections. Some villages, such as Cottenham, have been impacted by speculative development, resulting in inadequate public transport options for residents, particularly those without access to a vehicle. Others, such as Haslingfield and Harlton, have even more limited links and would benefit from better connections to Park and Rides / Travel Hubs, with cars remaining the only practicable way to get around. Development in such locations should be restricted. A priority should be establishing direct transport links to rail stations, as well as the Guided Busway, to reduce reliance on single occupancy vehicles.</p>	<p>200999 (D Smith), 201035 (S Jackson), 205204 (E Wilson)</p>
<p>The plan should do more to promote better connections to planned and existing stations, for example the new Cambridge South station.</p>	<p>201047 (P Spowart)</p>

<p>Recent and planned developments in Cambridge are resulting in particular transport pressures on Cambridge United matchdays. Public transport should be increased to help accommodate the traffic (up to 14,000 people), including greater park and ride provision in line with match times.</p>	<p>201157 (R Carling)</p>
<p>The East West Rail route will directly affect the peace and tranquillity of communities along the route and the construction will affect wildlife.</p>	<p>201362 (C Harrod)</p>
<p>Although East–West Rail is not allocated through the Local Plan, its potential impacts on villages such as Newton are clearly material considerations. Paragraph 22 of the NPPF requires plans to anticipate long-term infrastructure change. Increased rail services and associated development pressures may affect local road networks, connectivity and village character. The Plan should therefore include clearer recognition of these impacts and establish mitigation principles, including protection of local roads, integration of active travel routes and safeguards to maintain village character and cohesion.</p>	<p>206694 (Cllr R Williams)</p>
<p>Regarding EWR. The chosen southern approach to Cambridge (which we oppose) requires it to solve two very significant problems, to which it does not currently appear to have solutions. It has potential impact at both construction and operational stages on the rare barbastelle bat at Eversden and Wimpole Woods SAC. It also has potential adverse impact on the Mullard Radio Astronomy Observatory. Figures in Table 90 of the Transport Evidence Report do not provide enthusiastic support for a southern approach to Cambridge. How will the larger number from Cambourne who go to work in north east Cambridge or Northstowe get there by public transport? If EWR were to take a northern approach to Cambridge, not only could a station be built at Northstowe, but it could call at all three Cambridge stations, not something a southern approach can achieve.</p>	<p>208096 (Great Shelford PC)</p>

<p>Concerns raised around the closure of the existing Waterbeach station. This will disadvantage existing residents who live in the village. It is heavily used, reduces traffic, maintains clean air, improves connectivity for people and is sustainable. Closing the existing station would result in a 35 to 40 minute walk, encourage more car use and unfairly disadvantage elderly and disabled station users. There are examples of other stations elsewhere in Greater Cambridge that are similarly close together. Support for two stations to serve both existing village and new development and belief that there would be enough usage to warrant this, and it would keep through traffic from using Way Lane and Cody Road.</p>	<p>201363 (R Matthews), 201432 (J Cattermole), 201433 (C Munck), 201444 (A Cotton), 201634 (L Doe), 201371 (S Jeffery), 201365 (S Orbell), 201412 (A Richards), 201425 (J Jenkinson) 201428 (P Jordan), 201429 (S Reeves), 201472 (K Orbell), 201685 (J Martin), 201904 (S O'Donnell), 202996 (R Jones)</p>
<p>I would find it difficult to get to the new station & I would be quite lost without it.</p>	<p>201370 (J Plumb)</p>
<p>Additional park and ride needed east of Cambridge as a result of planned developments.</p>	<p>201441 (J Newton)</p>
<p>The policy does not adequately recognise the need for active travel connections for recreational purposes, including equestrian users, and focuses too heavily on connectivity and providing efficient links from A to B. The benefits of recreational walking and other activities such as cycling and horse riding should be fully acknowledged and planned for. Existing roads between villages are often designed for 60mph with no pavements, making them unsafe for vulnerable road users. Similarly, the IDP does not explicitly identify public rights of way as infrastructure to be delivered alongside growth, despite being essential to achieving the Local Plan's objectives for sustainable transport, green infrastructure, health and wellbeing.</p>	<p>201637 (P Cutmore), 201793 (Cambridge Group of Ramblers), 210972, 202016 (Swavesey PC), 201687, 208653 (British Horse Society), 204075 (S Rogers), 201717 (S Jeggo)</p>

<p>Part 2e of the policy is ambiguous on whether it applies to informal walking routes (permissive paths, tracks etc.). It is suggested that routes frequently used should be upgraded to public right of way (PRoW) status for better management and safety and to provide more routes for recreational purposes.</p>	<p>Stapleford PC (201648)</p>
<p>Support for the principles set out in the policy; however, noting that the strategy should reflect this more fully by directing growth towards the most sustainable, well-connected villages, or on the edge of Cambridge.</p>	<p>201961 (KG Moss Will Trust & Moss Family), 203907 (Hill Residential (Fulbourn Site)), 204436 (Hill Residential (Great Abington Site)), 201972, 201978 (Shelford Investments), 202372 (The CLC Trust), 202586 (Ely Diocesan Board of Finance), 205199 (North Barton Road Landowners Group), 205503 (T Woodcock), 211250 (Manor Oak Homes), 204217 (Hill Residential (Hardwick Site))</p>
<p>Need for greater focus on cumulative impact of consented and proposed developments on local infrastructure, particularly regarding traffic volume from HGVs, delivery vehicles, and cars. Without this, there is a risk of wider impacts not accounted for in the assessments (e.g. rat running in villages,</p>	<p>201972, 202016 (Swavesey PC)</p>

<p>bridges sinking under the cumulative load of traffic). It is recommended that all major development sites provide traffic and transport data on cumulative impacts rather than just site-specific impacts.</p>	
<p>Concern about lack of HGV parking causing issues and dangers in and around villages and the A14. Additional HGV parking is vital for any consented development.</p>	<p>201972, 202016 (Swavesey PC)</p>
<p>Key requirements in the policy should be made more specific and measurable and key terms should be defined. For example, what “sufficient” means in terms of different transport measures (for example, spacing of cycle routes every 250-400 metres in dense built-up areas), or “maximised opportunities for sustainable travel” in part 4, which needs strengthening and defining more precisely as it is not clear what baseline an application would be compared against. Terms that provide discretion should be removed; for example, removal of the word “appropriate” in relation to pedestrian prioritisation, setting firmer requirements around modal filters, and avoiding use of “should” instead of “must” in relation to the requirement for measures to be in place at early occupation. This will make the policy more enforceable and reduce the risk of car-reduction intent being watered down at application stage.</p>	<p>202601 (A Lawrence), 230567 (P Tribble), 204946 (Mothers CAN Cambridge), 204296 (Cambridge Past, Present and Future)</p>
<p>Safe walking and cycling connections should be provided between Girton, Eddington, and Darwin Green, in particular a well-lit, grade-separated underpass beneath Huntingdon Road that prioritises pedestrian and cycle movements over motor traffic and reduces risks to safety. This would better align with the basis on which Darwin Green and Eddington developments were allocated, promoting walking and cycling as the primary modes of local movement.</p>	<p>202268, 202410 (Girton PC)</p>

<p>Concern that CSET is designed to parcel off green belt for development, rather than improving public transport in an existing corridor.</p>	<p>203078 (T Lane)</p>
<p>Concern that CSET exploits inaccurate mapping of the Gog Magog Hills and conflicts with the green infrastructure aims of the draft Local Plan, suggesting an alternative on-road route could mitigate this issue.</p>	<p>209684 (Stapleford PC)</p>
<p>Objections to the CSET element of the transport strategy. Inconsistency noted between the green infrastructure objectives of the draft Local Plan and the transport strategy concerning the CSET busway. Concern over the harmful impact of the proposed CSET route on the Gog Magog Hills. Support for alternative, on-road bus route along the A1307 from the A11 to the</p> <p>The historically and geologically important Gog Magog Hills and their adjacent chalkland fringe, despite being given priority status for enhancing strategic green infrastructure across Greater Cambridge, are not given any consideration or protection when evaluating the environmental and landscape impacts of the proposed CSET busway. Its proposed section, from the east of Stapleford Granary to where it passes Nine Wells Local Nature Reserve will slash across the lower slopes of the Gog Magog Hills.</p> <p>The Gog Magog Hills, despite being a priority for enhancing strategic green infrastructure across Greater Cambridge, are not being accorded sufficient value and hence protection when evaluating the environmental and landscape impacts of the proposed route of the CSET busway. The lengthy</p>	<p>202637 (I Smith), 202678 (A Gannon), 203086, 203078 (T Lane), 203111 (N Campbell), 203124 (C Schofield), 203171 (J Jasiewicz), 203183 (D Morgan), 203206 (V Morgan), 203902 (H Painter), 204115 (A Baker), 204460 (N Pond), 204672 (M Fyfe), 204967 (O Arthurs), 205008 (C Arthurs), 207658 (K Foreman), 208558 (J Robinson)</p>

<p>section of the busway from where it crosses the track to the east of Stapleford Granary and continues in a north-westerly direction to where it passes Nine Wells Local Nature Reserve near Cambridge South Station will use the lower slopes of the Gog Magog Hills. There is, therefore, a glaring inconsistency between the green infrastructure aims of the draft Local Plan and its transport strategy. This inconsistency could be at least partly mitigated if an alternative, on-road route along the A1307 corridor from the A11 to the Cambridge Biomedical Campus (The proposed alternative route by 'Better Ways for Busways) was pursued instead.</p> <p>Building a new transport corridor through green space is manifestly inappropriate. It will reduce the recreational value of both Magog Down and Nine Wells among others, by generating increased noise, light and visual disturbance. I see no evidence that attention has been paid to light pollution.</p>	
<p>The current planned route for the CSET effectively destroys a region of Green Belt adjacent to Great Shelford, but provides no realistic additional transport options for the vast majority of village residents. Routing CSET along the so-called southern access road (page 51 of the draft Infrastructure Delivery Plan) extended to the Hinton Way roundabout and then on a dedicated bus lane along the A1307, whilst not benefiting any travellers from Great Shelford, would greatly diminish the destruction to the village Green Belt amenity and also reduce traffic along Hinton Way.</p>	208092 (Great Shelford PC)
<p>Great Shelford Parish Council is very strongly in favour of the alternative route for CSET proposed by Better Ways for Busways along A1307; it is both more economical and efficient and less deleterious to the countryside. We note that the slides used by GCSP on 15 January suggest that development</p>	208093 (Great Shelford PC)

<p>at CBC will need to contribute to CSET. This has the potential to introduce a re-examination of the costs of the proposals of the Greater Cambridge Partnership relative to alternatives</p>	
<p>We agree that improvements to key corridors should be pivotal to the transport strategy. However, CSET is not proposed to sit within a public transport corridor. Rather, it will create a new bus road across Green Belt land from the A11 at Grange Farm travelling north to terminate at Cambridge South Station. Better Ways for Busways has proposed an alternative route which does recognise the existing transport corridor and is, therefore, less environmentally destructive, improves accessibility for a range of different users, and is more cost-efficient. We would be happy to provide more detail of this alternative route if requested.</p>	208102 (Great Shelford PC)
<p>The policy reflects a misalignment between the plan and transport strategies pursued by the councils and GCP and the plan lacks a comprehensive strategy to enhance the bus network as a whole. There is a reliance on a bus-based strategy linked to park and ride sites, but a mismatch with the transport solutions identified on the ground (e.g. at grade crossings, lack of bus gates to prioritise buses) which risk slowing buses down and lack suitable modal prioritisation.</p>	202821 (Cambridge Past, Present and Future), 203097 (S Hughes)
<p>The Draft Plan places heavy reliance on future public transport improvements, including a relocated railway station and new bus infrastructure. As a resident, I am concerned that: - These schemes may not be delivered early enough. - Day-to-day travel for work, education, healthcare, and caring responsibilities will remain car-dependent. - There is insufficient policy emphasis on accessible transport for disabled and elderly residents. This risks non-compliance with the Public Sector Equality Duty.</p>	208979 (J Williams)

<p>The policy could do more to support improved bus services, including new developments designed for direct and efficient bus travel through them, ensuring an adequate bus services on first occupation of new developments, and that key bus routes should have frequent services available seven days a week, with long operating hours and guaranteed last bus home.</p>	<p>203097 (S Hughes),</p>
<p>Concern that this policy does not include any reference to heritage and propose an additional clause is added: 1g: Protect and enhance any heritage assets and their setting.</p>	<p>202821 (Cambridge Past, Present and Future)</p>
<p>Electric cars should be exempt from the restrictions in this policy</p>	<p>203097 (S Hughes)</p>
<p>The policy could go further in prioritising deliverable, near-term measures such as demand management (congestion charge/parking levy), a connected Park & Ride network, frequent reliable bus services, and upgraded stops near education sites. Clear milestones for zero-emission buses, robust Travel Plans, and stronger coordination of roadworks are essential to protect capacity and support net zero.</p>	<p>203006 (Hills Road Sixth Form College)</p>
<p>Rather than restricting development in areas with lack of sustainable transport, the plan could be more ambitious in supporting enhanced rural connectivity, such as travel hubs with car and cycle parking in larger villages, feeder bus services and safe cycle routes to those large villages, and EV charging points.</p>	<p>203886 (Great Wilbraham PC), 204128 (N Wilson)</p>
<p>There is a mismatch between the principles set out in this policy, (which are supported), and the sites chosen for development in this plan which actively avoid existing sustainable travel infrastructure and, in some cases, are in close proximity to major roads.</p>	<p>203567 (P Tribble), 203626 (H Thomas)</p>
<p>The policy could benefit from changes to make it clearer and more precise, including: removal of or clearer definition of “vision-led approach” in criterion 1; identifying specific “walkable neighbourhood”</p>	<p>203754 (Cambridge Green Party)</p>

<p>principles in criterion 2e; and including reference to other mode-mode interchanges in 2c. The last part of 2c should be strengthened to reflect the evidence that additional facilities help hubs to function better as valued, safe community assets.</p>	
<p>An explicit requirement for proposals to adhere to the sustainable travel hierarchy should be added.</p>	<p>204946 (Mothers CAN Cambridge)</p>
<p>The policy should embed the five active travel design principles – coherent, direct, safe, comfortable and attractive – as a clear policy test for all development.</p>	<p>202294 (R MacDonald), 201709 (J Anderson), 201778 (J O’Sullivan)</p>
<p>Considering the relative speed and effort needed for active travel trips compared to car trips, the plan should require making routes more direct by active travel than by car to generate more walking and cycle trips. For instance, new development could have mandated minimum number of links out of the development based on the size of the development.</p>	<p>203678 (T Preud’homme)</p>
<p>The policy could go further by clarifying that maximising sustainable travel opportunities should take precedence over road capacity interventions. There is also a lack of acknowledgment that developments can offset transport impacts through mode-shifting existing trips, which may conflict with CIL Regulation 122 (b). No clear guidance is provided on how mode-shifting can reduce the need for road capacity upgrade investments.</p>	<p>204296 (Cambridge Past, Present and Future)</p>
<p>The supporting text to the policy should be clearer around how trip budgets will be enforced and what the legal basis is for doing so, given the lack of highways powers to enforce and planning conditions cannot retrospectively identify additional measures needed if a trip budget is exceeded</p>	<p>204318 (Cambridge Past, Present and Future)</p>

Support for the principle of the policy, noting that development of separate dedicated public transport links where public transport is unaffected by general traffic congestion are essential for growth. Only by making public transport reliable and frequent will the problem of congestion be resolved	205070 (D Davies)
The policy could go further in emphasising the role of buses in addressing traffic congestion in Cambridge, especially on weekends, with long queues of cars waiting for the car parks, mostly running engines and spewing out pollution and carbon.	205162 (M Clarke)
The policy should recognise that the needs of pedestrians, wheelers and cyclists are different and sometimes clash. Lack of segregation between modes disadvantages walkers and wheelers who often don't feel safe close to fast cyclists and scooters	205259 (D Stoughton), 205322 (D Spiegelhalter)
Infrastructure policies should support widening of travel choices and support genuine choice of modes.	205485, 205477 (Cambridge and Peterborough Combined Authority), 208835 (D Smith)
A sustainable transport strategy is not one that replaces car dependency with cycling dependency. It is one that reduces unnecessary trips, supports realistic modal choice, and recognises that different people, journeys and locations require different solutions.	208835 (D Smith)
Walking, cycling, public transport and cars all have a role to play, therefore the plan should encourage sustainable choices where they are realistic and safe, maintain road access where alternatives are not viable, avoid road closures that displace traffic rather than reducing it, and avoid policies that are not inclusive to all.	208836 (D Smith)
Currently, the plan places disproportionate emphasis on reducing car use, while underplaying factors such as cleaner vehicle technology and hybrid and electric transition, realistic travel distances in	208837 (D Smith)

dispersed communities and the economic and social costs of restricting road access. Meanwhile, while safer, better connected cycling is supported, this should not be prioritised over road capacity where there are no alternatives or drive design decisions on new communities based on assumptions about uptake. Cycle infrastructure should be proportionate, well-designed and integrated, without excluding other users.	
The Plan should avoid: <ul style="list-style-type: none"> • designing entire communities around cycling assumptions, • removing road capacity without viable alternatives, • or assuming high cycling uptake regardless of age, ability, weather, terrain or trip purpose. 	208840 (D Smith)
The Plan must: <ul style="list-style-type: none"> • maintain reasonable road access, • avoid road closures that displace traffic rather than reduce it, • and assess impacts on emergency access, deliveries and local businesses. 	208841 (D Smith)
Bar Hill would benefit from a joined up pathway around the perimeter road, which has been requested by local councillors previously but not implemented.	205571 (P Spowart)
Reference to LTN 1/20 for cycling infrastructure but needs reference to LTN 1/24 which gives guidance for bus infrastructure design.	202520 (University of Cambridge)
References to e-scooters should be tweaked to saying e-scooters that are part of a DfT approved scheme e.g. Voi	202520 (University of Cambridge)
Residents of villages with limited or non-existent public transport often rely on driving to the nearest station to access rail services. Until realistic alternatives are in place, the Plan should ensure that	204550 (Cllr T Bygott)

station parking policies support inclusive access to public transport and do not undermine sustainable travel by inadvertently increasing car dependency by discouraging multi-modal trips.	
The policy could be updated to reflect that the transport needs of certain development, such as freight and logistics, are likely to be different, with the need to balance strategic location and strong sustainable transport measures. While the plan relies on the 2024 the NPPF, the more recent draft framework (2026) clarifies the importance of specific locational and operational requirements for freight and logistics development, advocating for a sector-specific approach.	204547 (Tritax Big Box Developments)
However, given the rapidly evolving policy landscape, forthcoming spatial planning strategies and other interdependencies, alongside a complex governance environment, it is important that the plan ensures explicit consideration of how uncertainty is managed in applying a vision-led approach to transport. Greater clarity on how the vision-led approach will remain robust and adaptable in the face of change would strengthen its effectiveness and support confident delivery.	203540 (Cambridge Ahead)
The policy should consider the importance of development phasing, ensuring transport improvements are secured and implemented progressively as communities develop.	204620 (Redrow South Midlands)
Clarification is needed on the definition, funding, and maintenance of “mobility hubs” in criterion 2c.	204620 (Redrow South Midlands)
I fully support the response which has been written by Camcycle. It's a remarkably detailed and insightful piece of work, and I would struggle to express any part of it better in my own words. I've read the draft version, which is currently available here: https://www.camcycle.org.uk/images/blog/Camcycle-DraftLocalPlanresponse-Jan2026.pdf	202606 (D Roberts)

<p>We must be careful not imbed car dependency into future developments, and we must also remember that electric cars are still very much cars (with many of the problems associated non-electric cars and several entirely new and unique ones).</p>	
<p>How will the traveller and gypsies site be policed to ensure they stick to the rules of the land as we all know at times they tend to be a law unto themselves with the police avoiding any contact and I speak from experience. My son had his car stolen but the police would not go to Willingham to get the car back.</p>	201403 (P Johnson)
<p>Greater Cambridge Local Plan needs to acknowledge the importance of PROWs for leisure purposes. The areas that are a priority mentioned in attached are:</p> <ul style="list-style-type: none"> • Having a vision and plan based on a map of future growth with gaps in PROW network identified Having officers and councillors with responsibility for PROWS • Having identified funding routes for improving the PROW network • Consulting with non motorised users groups and organisations at an early stage of Master Planning. 	208883,208884,208885,208886,208887,208888,208889,208890,208892 (Cambridge Group of Ramblers)
<ul style="list-style-type: none"> • Omission of the importance of PROWs for wellbeing and green infrastructure • Lack of recognition of the distinct and different needs for active travel and for leisure activities • No policies for funding the improvement of the PROW network • No mapping of the areas for growth with the gaps in the existing PROW network • No mechanism to ensure developers contribute to addressing the gaps • No proposals to engage with organisations and users of PROWs 	208883,208884,208885,208886,208887,208888,208889,208890,208891 (Cambridge Group of Ramblers)

<p>Rights of way are included in the Glossary under Green Infrastructure, but not mentioned elsewhere. References to green spaces to access opportunities to benefit new homes and jobs but not the importance of rights of way for health and well being, BNG opportunities, the environment. Rights of way are the inclusive leisure network distinctive from urban style walking and cycling active travel provision. Vision does not meet NPPF para 105 December 2024, PPG policies promoting inclusion of rights of way and users. Nothing to highlight the need for this provision.</p>	<p>201687 (British Horse Society)</p>
<p>The British Horse Society objects because it considers that the Infrastructure Delivery Plan is not fully effective or justified as it does not explicitly identify public rights of way as infrastructure to be delivered alongside growth. Rights of way, including bridleways, are essential to achieving the Local Plan's objectives for sustainable transport, green infrastructure, health and wellbeing. Their omission from the IDP risks inconsistent delivery and missed opportunities to secure improvements through development. The IDP should explicitly include rights of way and equestrian access, aligned with the Rights of Way Improvement Plan, to ensure coordinated and effective infrastructure delivery.</p>	<p>203598 (British Horse Society)</p>
<p>The policy should be strengthened to ensure equestrian access is embedded as a core requirement rather than an optional consideration.</p>	<p>208654 (British Horse Society)</p>
<p>1/ST 2 - please include equestrian 1/ST 2 e - add 'retain the rural character of rights of way' 1/ST 2g1 - add equestrian users</p>	<p>201717 (S Jeggo)</p>
<p>Vision-led integration of vehicular transport, prioritising active transport and better connectivity: with reference S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) project, support reduced</p>	<p>204276 (A Giarlis), 204286 (L Cooke), 204401 (NEUBAU Architecture Ltd), 205015 (M</p>

<p>reliance on vehicular transport and better integration of pedestrians and active transport users within a car-dominated infrastructure.</p> <p>Support integration of a bus network to mitigate reliance on vehicular traffic in this central, congested area. the new urban realm surrounding the infrastructure must achieve better connectivity N/S and E/W by redesigning the roundabout transport node, Prioritise pedestrian and cyclist desire lines and active transport modes (pedestrians, cyclists a.o.)</p>	<p>Cleminson), 205233 (Cambridge Junction/Create Cambridge), 205365, 205377 (University of Cambridge)</p>
<p>With reference S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) community project, I strongly object to proposals to demolish the Underpass. Safer, surface-level crossing for pedestrians and cyclists' can be achieved without demolition. The current on-grade arrangement offers no safe way for a low-speed, active transport participant. There are no pedestrian crossings or suitable crossing lines, nor any integrated cycle paths protecting cyclists. The current roundabout is car-centric, which could be addressed fairly quickly - by prioritising active transport, and in the long term, by integrating vehicular transport considerations with multi-disciplinary, urban design addressing the infrastructure as a whole.</p>	<p>204592 (T Woodcock)</p>
<p>Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.</p>	<p>210372 (Community Campaigner D Barton), 210373 (Community Campaigner D Barton)</p>
<p>Given that emergency service access is highly dependent on a safe road environment, EEAST supports Vision Zero principles. Health infrastructure resilience depends partly on safe transport</p>	<p>210339 (East of England Ambulance Service NHS Trust)</p>

<p>routes, which flooding and poor design can disrupt. EEAST requests:</p> <ul style="list-style-type: none"> • Clear sightlines at junctions and crossings • Sufficient road width to enable emergency vehicles to pass parked vehicles • Designing road/rail infrastructure to reduce incidents and • Speed-reducing design features (gateways, lighting, junction tightening) • Safe, accessible cycle parking for all cycle types (e-bikes, trikes, reclining, mobility scooters) and also need that disabled or older people may not have the strength to lift cycles onto racks • Secondary streets: provide sufficient road width to enable emergency vehicles to pass parked vehicles. • Car-free Zones: provide easy access and egress for emergency services in pedestrianised areas which include sufficient space for public to stand clear of moving emergency vehicles. • EEAST would advise speed humps/cushions can create issues for emergency ambulance services when responding under blue light conditions. This includes issues such as hindering delivery of clinical care and may contribute to damage to emergency ambulance vehicles and staff. 	
<p>Congestion is one of the most significant contributors to ambulance delay.</p> <p>EEAST requests:</p> <ul style="list-style-type: none"> • A transport assessment explicitly modelling blue-light travel times • No design element should obstruct emergency access (eg parked vehicles, pinch points, shared surfaces, traffic calming measures as these impact time taken to traverse a speed hump - each hump can add 8–16 seconds, driver behaviour to divert avoid Interfere with CPR and life-saving treatments, Increase pain and risk for patients with spinal injuries, fractures or trauma) 	<p>210340 (East of England Ambulance Service NHS Trust)</p>

<ul style="list-style-type: none"> • Full swept-path analysis demonstrating unrestricted ambulance movement for all ambulance types including bariatric, multi-victim and standard van ambulances. • Connectivity between locations – any pedestrianised areas need to ensure there are refuge places for pedestrians to safely stand to allow transit of emergency vehicles. Connectivity between housing and industrial estates for emergency services is also vital as every seconds delay could adversely affect life, long-term health outcomes and property. 	
<p>Ensure transport corridors need to ensure access for emergency services in and between neighbourhoods. Provision of access for emergency services at regular intervals to access the Guided Busway/Railways in the event of an incident.</p>	<p>210342 (East of England Ambulance Service NHS Trust)</p>
<p>The link between enabling active travel and improved physical and mental health, reduced health inequalities, and the prevention of chronic disease should be emphasised, as this provides a stronger rationale for prioritising active travel in all new developments. It is suggested that wording in the supporting information could be amended to include:</p> <p>Active travel such as walking, wheeling, and cycling, plays an important role in supporting the health and wellbeing of communities. Regular physical activity can reduce the risk of chronic diseases including heart disease, stroke, diabetes and some cancers, whilst also supporting healthy weight management and mental health. Prioritising active travel in neighbourhood design can also help to reduce health inequalities by making healthy choices easier and more accessible for all, including those who may not have access to a car.</p>	<p>210634 (Transport 2000 Cambs & W Suffolk)</p>
<p>The A1307 is a part of the strategic road network and an important corridor which should be referenced on all maps. SCC is committed to working collaboratively with GCSP, as well as West</p>	<p>210642 (Transport 2000 Cambs & W Suffolk)</p>

<p>Suffolk Council and Cambridgeshire County Council to improve safety and reduce the impacts of congestion on the A1307. Safety and congestion levels on the A1307 between Haverhill and Cambridge are a concern to SCC, and we urge Greater Cambridge to take every reasonable step to mitigate the transport impacts of new growth and solve existing problems on this key route, with a focus on sustainable transport.</p>	
<p>The A1307 was intended as a special road for HGV access only; using it for a site with significant HGV movements would conflict with vulnerable road users and the cycleway, so an alternative access arrangement is required for Slate Hall Farm. In addition, the continuity of the cycleway must be retained and protected to avoid loss of priority. Therefore, we would require alternative access arrangements to be made for any development on the Slate Hall Farm location.</p>	208075 (Northstowe TCI)
<p>Transport is a problem in Cambridge. There is support for active travel and policies on local buses (not the busway). Residents are concerned about the proposed route of the C2C busway from Cambourne to Cambridge, which would pass through the ward. There is local concern that the C2C busway will lead to the development of the West Fields, between Grange Road and the M11.</p>	210675 (Newnham Labour)
<p>Good public transport must be placed firmly at the heart of future development. Public transport, including active travel, should shape development outcomes rather than respond to them. Trains, buses, and active travel are the genuinely sustainable modes of transport. We cannot accept the premise within the draft plan that electric vehicles form part of a sustainable transport solution. While they have a role to play in decarbonisation and improving air quality, electric vehicles contribute to many of the problems the plan seeks to address, including congestion, land take, and particulate</p>	208029 (Railfuture East Anglia)

<p>pollution from tyres and brake dust and low costs of EV charging will encourage modal shift away from buses and trains - opposite of the stated aims of the Local Plan.</p>	
<p>While the focus of development close to the city's three railway stations is supported, the regional railway network outside the city, including its seven local stations, has been largely overlooked in the draft plan, except around Cambourne, which is a station yet to be built. The railway already shapes major travel flows in the area. Stations at Whittlesford Parkway, Shelford, Ashwell & Morden, Meldreth, Shepreth, Foxton, and Waterbeach are vital assets and the passenger flows from these stations are substantial. The draft Local Plan must explicitly recognise the importance of these local and city stations and the potential for existing rail lines to operate as a formal metro system serving key employment and development areas.</p>	208030 (Railfuture East Anglia)
<p>Local stations at Ashwell & Morden, Meldreth, Shepreth, Foxton, Whittlesford Parkway, Shelford, and Waterbeach village are already well used, but access must be improved. The plan should commit future authorities to:</p> <ul style="list-style-type: none"> • Providing step-free access at all stations, including lifts and footbridges between platforms. • Work with Network Rail and Greater British Railway to safeguard land for platform extensions, new footbridges, lifts etc as appropriate. • Delivering safe, direct cycling and walking routes linking stations to their villages and surrounding villages building on the Greenway network. It is particularly concerning that there is currently no safe walking and cycling route between Sawston, Duxford, and Whittlesford Parkway 	208032 (Railfuture East Anglia)
<p>In East Cambridge, the plan should commit to working towards a new station on the Newmarket line near Yarrow Road and Gazelle Way, ideally with the removal of the level crossing and its replacement by a bridge. In connection with these developments the future authority should</p>	208037 (Railfuture East Anglia)

<p>demonstrate its backing of the restoration of double tracking of the Newmarket railway with Newmarket becoming the turnback station for EWR. Land along Gazelle Way should also be safeguarded for a future light rail line linking east Cambridge to the airport site and Cambridge North continuing via Orchard Park to Darwin Green, Eddington, and Cambridge West, potentially using the part of the guided busway corridor.</p>	
<p>Points 2a) to h) are broadly supported. It is however questioned what is meant by “mobility hubs” and how these would be funded and maintained. Point 3 is broadly in accordance with the NPPF paragraph 116, though the wording could be simplified. Policy I/ST may want to mention the relevance of development phasing, where transport improvements are secured and implemented over time as communities grow.</p>	204622 (Redrow South Midlands)
<p>Travel and traffic management are critical for the villages north of the A428, with concerns about the lack of the Combined Authority’s Travel Strategy.</p>	210452 (P Deer)
<p>If you approve the CSET off-road busway it will carve a 14 meter wide swathe through the green belt at a cost of more than £160 million of public funds. Even using the GCP's highly dubious calculations to justify the business case, the Benefit to Cost Ratio is significantly less than 1. Which means that you get less than a pound's economic value for every pound spent. A guaranteed loss. You cannot justify supporting that to local residents. In contrast, if the GCP's old scheme along the A1307 corridor was built at a cost of £60 million, the BCR increases to about 1.5. While this isn't a great return on investment, it does at least mean that the public are getting some value for their taxes.</p>	208137 (M Harper)
<p>The GCP's scheme does not include the cost of carbon or biodiversity net gain requirements that are now law for all private developments.</p>	208138 (M Harper)

<p>I agree that improvement to key transport corridors should have a high priority, but the proposed CSET route does not lie within an existing transport corridor. It will unnecessarily compromise the important landscape on the south east side of Cambridge, including the lower slopes of the Gog Magog Hills and the River Granta river valley, when it could be routed alongside the A1307 at a much lower cost. The latest cost estimate I have seen was £160m. This will almost certainly increase to well above £200m by the time it is built, and possibly considerably more. This is a ridiculously high burden on the public purse for an 8 km roadway when a much cheaper and shorter option is available.</p>	<p>208181 (J Coppendale)</p>
<p>In the medium to long term, there is a need for an efficient railway or tram line from Haverhill into Cambridge with suitably placed stations along the way is required. I think it will be a big mistake if this need is ignored. Trains and trams are more efficient than buses. Go to Nottingham to see trams working well – they even stop at the front door of the hospital there</p>	<p>206545 (A Gresham)</p>
<p>Improve bus services</p> <p>At present there is a short term need is for more efficient buses running to and from an area. This can be achieved relatively cheaply and effectively with strategically placed bus lanes on the A1307, a spur road to Addenbrooke's and much more effective traffic management in and around the Addenbrooke's site and on Hills Road into Cambridge. It requires better layouts, lanes, traffic management systems and better operation of traffic lights.</p>	<p>206544 (A Gresham), 203236, 203246 (G Heathcock)</p>

<p>Improve bus services on Babraham Road, Perne Road and Netherhall Gardens, where current provision is limited or absent, to encourage alternatives to car use. Increase evening and weekend bus frequencies (currently every 30 minutes) to Addenbrookes Hospital and the main rail station.</p> <p>Provide more information and a more regular bus service between Ely Station and the city centre, together with better promotion of the service.</p>	
<p>In my opinion, all this proposed busway might do is to encourage some people working at Addenbrooke's to drive to a new Park and Ride site and then use the busway. This busway will also not provide a benefit to most people in Sawston, Stapleford and Shelford because the busway stops for those villages will be too far away from most people in those villages unless they use their cars to get there.</p>	206543 (A Gresham)
<p>I object to this proposed busway because it will not deliver a major benefit to people living in the area from Cambridge to at least as far as Haverhill who need to travel to and from Cambridge (not just the Addenbrooke's site). I also consider that if the busway is constructed it will be a big waste of money and it will make several existing problems much worse. The major need is to make significantly effective improvements to public transport into Cambridge from further away – in this case at least as far as Haverhill.</p>	206542 (A Gresham)
<p>Planners have wrongly endorsed CSET despite sound arguments against it. A busway will</p> <ul style="list-style-type: none"> • not improve transport to, from, in or around the campus. • Not come from far away or go on into the city. <p>Improvement of existing corridors is less destructive, serves more people and is more cost-efficient. Multi-modal access road isn't needed. Instead a spur off the Hinton Way roundabout would:</p>	203193 (A Gresham)

<ul style="list-style-type: none"> • connect all of the Campus with the Station. • Ease local traffic. • Be close to Babraham P&R. Why have another P&R nearby at Four Wentways? • Give better access for ambulances. 	
<p>It is noted that the transport evidence base draws from the new Cambridgeshire and Peterborough transport model. The model does not currently take account of the impacts of Universal Studios or the two proposed new towns. The inclusion of Universal Studios impacts on transport will be essential to modelling for all plans across the Ox Cam region and should be incorporated in the modelling undertaken for Greater Cambridge's emerging plan. Bedford Borough Council is working with National Highways and other partners to facilitate this and would advise that Greater Cambridge LPA liaise with National Highways to ensure that the impacts are fully and transparently accounted for on a consistent basis across the region where it is expected that there will be cross boundary movements.</p>	208228 (Bedford Borough Council)
<p>I would like to see this policy extended to existing communities. Existing Towns, Rural Centres and Minor Rural Centres all would benefit from improvements to sustainable transport and connectivity. I would the Local Plan to give these communities greater opportunity to retrofit these improvements into their existing layouts. Best practice is often dismissed as irrelevant outside urban centres, it would be beneficial for the Local Plan to state this is not the case.</p>	201836 (T Mckeown)
<p>Active travel/sustainable travel must in at the beginning at the centre. Not a decoration. It needs to be easier than the alternatives, otherwise people will use them. Make it easier, pleasant, and lovely. Make the necessary journeys short and sweet.</p>	202193 (R Forder)

Cambridge should have a community taxi. So probably cost more than bus but less than ordinary taxi. For awkward routes or times people could use ordinary buses one way and cherish taxi the other.	202293 (F Blows)
No Comment.	202653 (C Pointon)
New developments must be designed to facilitate direct and efficient bus operation, following the principles set out in Bus Services & New Residential Developments (Second Edition).	203220 (Cambridge Area Bus Users)
Bus services are as, if not more important, for bus travel as dedicated bus infrastructure. The Local Plan must set out a service pattern for key routes (frequent services, 7 day a week operation, long operating hours, guaranteed last bus) that will make bus travel attractive for all everyday journeys, not just travel to. Measures to enable buses to travel into and through Cambridge unimpeded are essential. Without these, bus services to and from new developments will be highly unreliable, slow and expensive to run. Buses should also serve key destinations (employment, education, medical and leisure) directly.	203221 (Cambridge Area Bus Users)
Travel by bus must be easy and attractive from day one of occupation of a new development, and developer contributions should support bus services for an extended period (we suggest ten years) so residents have the services they need to build the habit of bus travel.	203222 (Cambridge Area Bus Users)
The ability of residents in new developments to travel by bus depends to a large part on the quality of the whole bus network (which is currently inadequate for its communities' needs), not just the quality of the infrastructure/services that come with new developments, The Local Plan should establish methods to raise funds for an expanded bus network across Greater Cambridge.	203223 (Cambridge Area Bus Users)

<p>A good bus network is a lifeline, connecting people with social networks, personal development opportunities and essential services at a cost they can afford. It is particularly important for young people, whose transport options are limited and financial circumstances often challenging. Bus travel is therefore an important tool to boost health, wellbeing and social inclusion. The Local Plan should recognise it as such, and establish policies to bring about easy bus access to key services, education providers and community, sports and leisure facilities, especially those delivered via the Plan.</p>	<p>203224 (Cambridge Area Bus Users)</p>
<p>The Plan treats electric cars as a form of sustainable transport. This is contrary to its vision to minimise reliance on the private car. Electric private cars also have the same impacts on congestion and road safety as petrol or diesel cars. The Plan must be explicit that it prioritises travel by public transport, walking/wheeling and cycling.</p>	<p>203225 (Cambridge Area Bus Users)</p>
<p>We support new development minimising carbon emissions and reliance on the private car. The high level of private car traffic in and around Cambridge is already a significant hindrance to reliable and attractive bus transport. Despite the ambitions, it is not clear the policies it contains will achieve this aim. The Transport Evidence Report estimates that only just under half of trips from new developments will be made by non-car modes, therefore a mismatch between the vision and the expected outcomes.</p> <p>The Local Plan would be more likely to achieve its Vision if a greater percentage of the new housing was planned for sites in and on the edge of Cambridge, or next to existing public transport hubs, instead of in new settlements miles from the city. Planning to locate sites of employment closer to new developments would also help the Plan to bring about its stated transport goal.</p>	<p>203226 (Cambridge Area Bus Users)</p>

<p>The phrase 'sustainable transport' is not defined in this policy, however elsewhere in the Plan, electric vehicles are included as a form of sustainable transport. The Local Plan will not achieve its vision of minimising reliance on private cars if electric vehicles are treated as a sustainable transport mode.</p>	<p>203227 (Cambridge Area Bus Users)</p>
<p>It should be made clear throughout the Plan that the ambition is to encourage the greatest possible movement by walking, wheeling, cycling and public transport. Policy I/ST should be renamed 'Walking, wheeling, cycling and public transport' and subsequent references in the text updated accordingly. The definition of sustainable transport in the glossary should also be amended to remove low and ultra-low emission vehicles.</p>	<p>203228 (Cambridge Area Bus Users)</p>
<p>Policy could be strengthened:</p> <p>1- 'Reduce reliance' should be replaced with 'minimise reliance'</p> <p>2 - suggest Amed to read ""Planning permission will only be granted for development where the site will, by first occupation, prioritise integration and accessibility by walking, wheeling, cycling and public transport.""</p> <p>2b - the phrase 'to provide real travel choice' should be repeated</p> <p>2b - suggest new wording as follows: "Ensuring major developments are supported by high quality public transport routes and frequent services linking them to Cambridge city centre, and other key destinations including major centres of employment, education and services, to provide real travel choice for all journeys.' 2bi Public transport services to and from new developments should:</p> <p>- Run at least every 15 mins in peak periods - Run 7 days a week - Run in the early mornings and late at night - Include a guaranteed last bus"</p>	<p>203229 (Cambridge Area Bus Users)</p>

<p>In section 2c - The list of facilities should include comfortable waiting areas. The phrase starting 'located within walking,' should be strengthened so that it reads 'located within easy walking, wheeling and cycling travel distance of residents.' 2g - The needs of buses are entirely missing from 2g. Revise: 2gii - 'it restricts through access for private cars where appropriate', so as not to exclude buses' There needs to be a new sub-section in between 2gi and 2gii as follows:- It [new road and road access] is designed to facilitate direct and efficient bus operation</p>	<p>203230 (Cambridge Area Bus Users)</p>
<p>The supporting information that accompanies this policy should make clear that streets in new developments should be designed as outlined in Bus Services & New Residential Developments (Second Edition) in line with expectations set out in DfTCircular LTN01/24 "Bus User Priority". There should also be an additional sub-section about adoption of new roads by The Highway Authority. Cambridgeshire County Council should adopt new roads as early as possible in the construction process. As explained in the blog Embedding public transport in new developments: time to adopt a new approach? (Bus Centre of Excellence 2024.</p>	<p>203231 (Cambridge Area Bus Users)</p>
<p>The importance of tackling existing challenges around bus travel in Greater Cambridge. We welcome the inclusion of 'services' in this subsection, alongside infrastructure and behavioural change measures. We emphasise that for bus travel, services are as, if not more important, as dedicated bus infrastructure. The final phrase of this sub-section should be amended to 'to encourage the use of walking, wheeling, cycling and public transport.' It should be clear that electric private cars, while preferable to diesel and petrol vehicles, are not the modes of transport the Plan prioritises.</p>	<p>203232 (Cambridge Area Bus Users)</p>
<p>We also welcome inclusion of the phrase 'to address transport infrastructure in the wider area' (our emphasis) in this sub-section. The geographical consideration is relevant to services as well as</p>	<p>203233 (Cambridge Area Bus Users)</p>

<p>infrastructure, however. The point should read: “to address transport infrastructure and services in the wider area including across the district boundary, or behavioural change measures....”</p>	
<p>If new development is going to minimise reliance on the private car, then the Local Plan and the accompanying Greater Cambridge Transport Strategy must have a wider aim of making public transport convenient and much more reliable across Greater Cambridge (or more widely), not just to provide new bus links to Cambridge from new developments. Will a resident of Grange Farm consider bus travel a real choice if bus services to and from that development are highly unreliable due to motor traffic congestion along Hills Road in Cambridge? Will that household forgo purchasing a car or a second car if few daily journeys are easily achievable by bus?</p>	<p>203234 (Cambridge Area Bus Users)</p>
<p>Criteria 3 - it is essential that travel by bus is easy, safe and attractive from day one of occupation of a new development, otherwise driving a car will immediately become the default choice. The wording ‘to meet the first or early occupation of a site’ is too ambiguous and should be tightened. We also suggest that developer contributions should support bus services for at least ten years (or five years after full occupation of a site, whichever is the longer), so residents have the services they need to build the habit of bus travel, as is set out in The City of York adopted plan (p294/295).</p>	<p>203236 (Cambridge Area Bus Users)</p>
<p>Provide more information and a more regular bus service between Ely Station and the city centre, together with better promotion of the service.</p>	<p>203247 (G Heathcock)</p>
<p>We welcome the inclusion of public toilets and cafes in travel hubs (para 1.c).</p>	<p>203607 (Cambridge City Council Liberal Democrat Group)</p>

<p>The cycling infrastructure in Cambridge is not adequate considering the number of cyclists in the city. I approve of this policy because it encourages the development of more cycling infrastructure.</p>	<p>203737 (W Clements)</p>
<p>The principle of reducing reliance on private car travel and the promotion of sustainable, inclusive and well-connected development through a vision-led approach is strongly supported and align with objectives for Papworth South. Of particular support is subsection (c) which requires the provision of new mobility (travel hubs) to enable interchange between different modes of sustainable transport. It is considered that the wording used to define travel hubs are expanded to other community and connectivity requirements, to provide flexibility to the community in question.</p>	<p>207028 (Mac Mic Land)</p>
<p>Shifting away from car use also requires the provision of well-designed public transport systems, & provision of walking & cycling routes and infrastructure.</p>	<p>207321 (A Hoare)</p>
<p>There is no provision for active travel along Elizabeth Way. The cycle lanes are death traps disappearing where the roadway narrows as cars get priority. It is a private car dominated road with varying widths and no evidence of public transport. The pavements are uninviting and narrow. Removing this second outer lane would prevent accidents. The pedestrian crossing at the junction of Chesterton Road and Elizabeth Way is treacherous. Keeping a 20 mph zone at 100 metres either side of the crossing might dissuade motorists from speeding. The area is between areas on the Local Plan, but has been neglected for many years. Fund planting on the remaining front gardens to make the route inviting and less of a heat trap in summer and plant shrubs in the central island of Elizabeth Bridge</p>	<p>208022 (S Stickley)</p>
<p>We are broadly supportive of this policy. Policy I/ST clauses 2d and 2e – it should be recognised that many walking routes in daily use are not public rights of way but are instead either informal tracks</p>	<p>210959 (Great Shelford PC)</p>

<p>used without permission (often around the edges of farmland) or permissive paths (lapsed or otherwise). They are an integral and largely unmanaged part of the daily walking network and improve connectivity in the absence of an adequate network of public rights of way. It is unclear how clause 2e could be applied under such circumstances. Therefore, routes in daily use should be upgraded to PRow status such that they can be managed appropriately and better and more safely improve local connectivity. Dual benefits will accrue from their use for recreational purposes.</p>	
<p>Despite being just 4 miles from the centre of Cambridge the road journey into the city is both unreliable and slow, often taking a disproportionate time to travel the four miles. This is due to traffic congestion and the failure of the City Access Programme to improve non-car travel into the centre of Cambridge. This long standing issue requires urgent attention. We note that the CPCA has committed to preparing, engaging on - there appears to be no commitment to public consultation - and finalising the sub-regional Greater Cambridge Transport Strategy in time to support the finalisation of the draft Local Plan. This seems an extremely ambitious timetable as we have not seen any proposals on City Access Proxy or any other related matter to date.</p>	210889 (Great Shelford PC)
<p>Great Shelford is relatively well served by bus routes. However, like all other motorised transport buses suffer from extreme levels of congestion in and out of Cambridge and CBC at rush hours. Infrequent service in the evenings and at weekends contributes to the use of cars and taxis.</p>	210888 (Great Shelford PC)
<p>It would be beneficial to residents of the parish to have a direct active travel route to Whittlesford Parkway station, taking in Dernford Reservoir and the nearby SSSI and Sawston Business Park. Great Shelford benefits from the Genome/Chisholm cycle path, however it has a poor surface with very poor lighting. In addition the connection into CBC is currently very poor due to construction work</p>	210887 (Great Shelford PC)

<p>for Cambridge South station. The extension in the form of the Sawston Greenway is a shadow of the original proposals. The draft IDP refers to “Proportionate contributions to Addenbrooke’s Road to Shelford Tier 2 active travel network (LCWIP route)” and “Additional pedestrian and cycle connections from Babraham Road, south of Nine Wells”. We are not familiar with these projects, both of which appear to be within the parish.</p>	
<p>It is important that long term future traffic developments in and around Great Shelford are carefully planned to accommodate the physical infrastructure of the village and also the interests of the village inhabitants. It is unclear how current transport plans will achieve this. Known existing problem areas identified in the draft Infrastructure Delivery Plan at page 28 do not, but should, include the A1301 through Great Shelford and the level crossings on Granhams Road and Hinton Way. Outside Great Shelford, the Addenbrookes Relief Road is a (significant problem.</p>	208090 (Great Shelford PC)
<p>Shelford benefits from having a station on the Cambridge to Liverpool Street railway line. However trains typically stop only every hour during the day and every 30 minutes at peak times. This is insufficient to provide a realistic alternative to much car use. We are completely opposed to any private vehicle traffic being able to use the proposed entrance to Phases 3 and 4 of CBC from Granhams Road as this will unquestionably worsen the traffic through the village and at the High Green junction. Private car parking for these parts of CBC should be in the Babraham Park and Ride or the Trumpington Park and Ride.</p>	208091 (Great Shelford PC)
<p>Policies within the Infrastructure theme (including sustainable transport and connectivity) are central to reducing reliance on cars and supporting active travel. CLAF endorses the move towards pedestrian and cycle priority, but highlights the need for:</p> <ul style="list-style-type: none"> • A strategic approach that maintains rural 	208172, 208168 (Cambridgeshire Local Access Forum)

<p>rights of way connectivity, not only within built areas. • Recognition that, for many people accessing the countryside, rights of way are the primary means of travel for recreation and short utility journeys Where new development is likely to increase recreational pressure on the countryside, CLAF supports: • Proactive mitigation measures, including improved access infrastructure and circular routes, to disperse recreational use and reduce impacts on sensitive landscapes. • Securing access improvements through planning agreements to ensure timely delivery and long-term maintenance. 6. Monitoring and Delivery CLAF recommends that: • The Monitoring Framework includes specific indicators related to rights of way condition, connectivity and user satisfaction. • Delivery mechanisms are clearly identified for the implementation of access improvements, including collaboration with parish councils, landowners and user groups..</p>	
<p>Welcome the inclusion of a policy for sustainable transport and connectivity. While this Local Plan will be tested against the December 2024 NPPF, Recommend that the Council consider making reference to the Department for Transport's Connectivity Tool in order to future-proof the Local Plan. Part 3 of the policy states that 'development will only be permitted where they do not have an unacceptable transport and highways safety impact'. This should be updated to reflect the 2024 NPPF's requirement to avoid severe highway safety impacts.</p>	208698 (Guilden Morden Development Ltd)
<p>We ask that as a strict condition of the Draft Local Plan with its planned level of accelerated jobs and housing growth proceeding to full approval, there is a firm guarantee. of the transport wherewithal being in place in good time to ensure that the planned 20 percent reduction in traffic on our road</p>	208740 (Trumpington Residents Association)

network is achieved well in advance of 2045 and maintained thereafter.	
The policy states that developers of “large developments” or proposals with “significant transport implications” will be required to demonstrate that opportunities for sustainable travel have been maximised through the submission of a vision led Transport Assessment and Travel Plan. While the intent of this requirement is supported, it is considered that this wording more appropriately relates to validation requirements rather than policy itself.	210269 (Vistry Group)
The policy requires a vision-led approach to transport rather than the predict and provide model, which reflects the shift in national planning policy. The National Trust supports this approach and would welcome opportunities to help connect new developments to our sites through sustainable new connections and transport modes.	211085 (The National Trust)
Local transport systems are failing to meet current needs and are completely inadequate to support the scale of growth in the Cambridge region, both historical and planned. The plan should state unequivocally that an integrated mass rapid-transit (MRT) network is an urgent regional priority, extending beyond Cambridge to towns such as Huntingdon, St Ives, St Neots/Tempsford, Ely, Newmarket, Haverhill and Peterborough.	208197 (Cambridge Connect)
A phased construction timetable and explicit financing mechanisms (e.g., land-value capture, workplace parking levy, green infrastructure bond) are needed to deliver the MRT network and link growth clusters to it.	208198 (Cambridge Connect)
The Cambridgeshire Guided Busway should not be described as ‘high quality’ because busways lack the capacity, frequency and reliability of European light-rail systems. The existing and planned	208199 (Cambridge Connect)

<p>busways also suffer from the major weakness that they are not integrated, or joined up. Nor do they extend into the core of the city. This lack of multi-modal and spatial integration greatly extends overall journey times, and acts as a serious disincentive to people in their decisions about use of public transport.</p>	
<p>Support EWR. We suggest Cambourne could be better served by light rail mass transit linking to Cambridge City and the central rail station. The route we propose follows parallel to the A428 via the Girton Interchange / Eddington / West Campus, and would provide a twenty-minute journey time into the city. A more southerly direct route would save money that could be directed to finance the light rail connection. We encourage the Government, local authorities and EWR to consider this option.</p>	208200 (Cambridge Connect)
<p>The proposed C2C busway should be opposed on strategic (poor city-centre integration) and environmental (habitat loss at Coton Orchard) grounds. The lack of integration across the city will suppress demand and serve to perpetuate poor uptake of public transport. Destruction of habitat at Coton Orchard when there are viable alternatives, including use of the existing transport corridor of the A428 is objected to. The GCP has failed to consider alternatives properly when selecting the C2C route.</p>	208201 (Cambridge Connect)
<p>We note development at Grange Farm, Babraham Research Campus, Granta Park, Genome Campus and CBC. We strongly support transport improvements to meet these needs. However, we oppose CSET due to its unnecessary compromise and impact on chalk-stream ecology and the Green Belt. A viable and less damaging alternative transport option exists nearby on the ready-made former rail corridor leading to Granta Park / Haverhill.</p>	208202 (Cambridge Connect)

<p>Re-use of the former rail corridor to Granta Park / Haverhill could serve both new housing, campuses and surrounding villages and local communities with frequent and rapid shuttle services and providing 24-hour autonomous shuttles. Moreover, many of those working at the southern biotech campuses reside in Haverhill (~14% of the CBC workforce), which provides much-needed housing at relatively lower cost.</p>	<p>208203 (Cambridge Connect)</p>
<p>A tunnel is essential for any MRT system in the historic core to protect heritage assets and the River Cam, and to free the surface for pedestrians and cyclists. The Local Plan should consider how mass rapid transit can be spatially integrated into the historic city, and at a minimum should review international case studies for strategic guidance. A tunnel is only likely to be viable for mass rapid transit such as metro or light rail. Buses and busways will never attract finance for a tunnel.</p>	<p>208204 (Cambridge Connect)</p>
<p>We welcome provision to “require developments to contribute towards the cost of these transport schemes”. However, the Local Plan needs to be more imaginative and consider a wider range of financing options, as this lies at the core of delivery of transport improvements. The strategy needs to be specific about the spatial plan – ie about clusters and corridors of growth – and how they will be facilitated and supported in a practical and sustainable way by the transport network.</p>	<p>208205 (Cambridge Connect)</p>
<p>Existing village stations lack safe active-travel routes such as multi-use paths linking them to surrounding villages (e.g., Sawston to Whittlesford Parkway, Thriplow to Foxton, Whaddon to Meldreth).</p>	<p>208410 (Cam Valley Community Rail Partnership)</p>
<p>Stations such as Whittlesford Parkway and Meldreth require lifts and ramps to provide full accessibility for all users.</p>	<p>208411 (Cam Valley Community Rail Partnership)</p>

Frequent and prolonged level-crossing barrier downtimes at stations like Shelford, Shepreth and Foxton deter passengers and need mitigation.	208412 (Cam Valley Community Rail Partnership)
Wayfinding and mapping for active-travel access to local rail stations are inadequate or missing and should be improved.	208413 (Cam Valley Community Rail Partnership)
Bus connections to stations are insufficient and should be prioritised, with links to strategic sites incorporated into Section 106 agreements.	208414 (Cam Valley Community Rail Partnership)
An integrated station-access strategy is required for local stations, covering on-site accessibility and active-travel routes for neighbouring communities.	208415 (Cam Valley Community Rail Partnership)
Improvements to existing local rail station will require partnership funding. It is unclear how Section 106 and CIL contributions from new developments will be allocated beyond the primary growth communities; clarification is needed.	208416 (Cam Valley Community Rail Partnership)
We look forward to the opening of the new station at Cambridge South which will be a brilliant addition to the local and regional rail network. Its full potential depends on access and onward travel factors at both ends of the passenger journey. An integrated access strategy for Cambridge South should include safe, direct pedestrian and cycle routes, clear wayfinding, and seamless interchange with bus and shuttle services. Onward travel from the station to destinations near to CBC or the outside of the campus area should be clear and should address accessibility issues to and from the station to mitigate further road congestion and associated problems.	208417 (Cam Valley Community Rail Partnership)
The plan does not provide a cumulative traffic assessment for the four proposed logistics sites, which is a significant shortfall.	206370 (Boxworth Parish Meeting on behalf of A14)

	Logistic Forum), 211439 (Boxworth Parish Meeting)
No developer has supplied high- or low-case traffic forecasts, making it impossible to evaluate access and mitigation measures despite numerous requests at the public consultations and in parish engagements. This is disappointing and makes meaningful assessment of proposed access to the sites and any mitigations difficult, if not impossible. Developers should be required to make this public prior to the next round of consultation.	206372 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211440 (Boxworth Parish Meeting)
Structural problems on the A14 bridges at junctions 24 and 25 are worsening and require permanent solutions, which the plan does not address.	206373 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211441 (Boxworth Parish Meeting)
Existing congestion at the B1050/A1307 junction, the Swavesey south roundabout, and the weight-restricted Boxworth Road is severe and the plan provides no mitigation. There are general comments made regarding traffic calming and other restrictions, but such measures have already been installed and have not made a significant impact on traffic flows.	206374 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211442 (Boxworth Parish Meeting)
It is difficult to see how the existing road network through the villages either side of the A14 corridor will accommodate increased traffic. As a minimum, consideration needs to be given at an early stage to new roads providing effective bypasses for Dry Drayton, to prevent traffic rat running between the A14 and A428, Boxworth and Knapwell to remove traffic rat running between the extended Cambourne and the new station and villages to the north and north east. Elsworth needs a by pass that will take traffic from the north and north west which already rat runs through the village to the new developments.	206375 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211443 (Boxworth Parish Meeting)

<p>The timing of infrastructure improvements is vital, not just in relation to new roads. It is too often the case that infrastructure improvements lag the construction of new developments by many years. This is unacceptable. New infrastructure needs to be in place before any significant development takes place. The Plan is silent on specific public transport proposals which will support the proposed developments and the surrounding communities. It is unreasonable to ask local communities to respond to the Plan consultation in the absence of information on how these traffic issues will be addressed and without sight of the Regional Transport Strategy that is not due to be completed until the end of 2026.</p>	<p>206376 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211445 (Boxworth Parish Meeting)</p>
<p>Policy I/ST Para 3 should be amended to require any logistics development above a defined size to demonstrate access from the National Highways network, including necessary junction upgrades.</p>	<p>206378 (Boxworth Parish Meeting on behalf of Logistic Forum), 211431 (Boxworth Parish Meeting)</p>
<p>Policy I/ST seeks to promote sustainable transport and connectivity through new developments, which is supported in accordance with Paragraph 110 of the Framework. However, Part 3 of the draft Policy text identifies that developments will only be permitted where they do not have an unacceptable impact on transport and highway safety. This part of the Policy must be amended, whereby the proposed wording presently conflicts with Paragraph 116 of the Framework which is explicit that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. This amendment should be implemented to ensure that the Draft Plan is capable of being found sound at Examination in accordance with Paragraph 36 of the Framework which requires that Local Plans must be consistent with national policy.</p>	<p>211292 (Woolsington One Ltd)</p>

<p>Policies TI/2 (Transport Infrastructure) and TI/3 (Infrastructure Delivery) must ensure that walking, wheeling, and public transport routes are safe, step-free, and accessible from the outset. The Plan should acknowledge that much growth is proposed in areas where existing pavements are not accessible and require developers to address these deficiencies as part of development proposals.</p>	<p>208954 (CPRE Cambridgeshire and Peterborough)</p>
<p>Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.</p>	<p>210374 (Mr Community Campaigner David Barton)</p>
<p>We are mindful of ambitious national growth plans for Greater Cambridge, and of potential and already developing new towns, rail stations and other transport infrastructure, including East West Rail. Existing local rail networks in the South Cambridgeshire Cam Valley CRP area, and the advent of Cambridge South Station, hold huge potential to positively contribute to sustainable travel.</p>	<p>211113 (Cam Valley Community Rail Partnership)</p>
<p>It is recognised that it is important that transport impacts of development should be managed, and new development should be located, designed and connected to the transport network to enable travel by sustainable modes.</p>	<p>211572 (Martin Grant Land Limited)</p>
<p>We support the development of the A11 travel hub.</p>	<p>213269 (Horseheath PC)</p>
<p>EWR Co also supports the Plan's focus on promoting patterns of development that enable low carbon transport modes, shifting away from a reliance on private cars, which is reflected in the Climate Change and Infrastructure strategic priorities and draft Policy I/ST.</p>	<p>211886 (East West Rail)</p>

Policy I/MH: Mobility hub facilities

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy's overall aim to deliver a more sustainable integrated transport network through enhancing existing travel hubs and delivering new hubs across Greater Cambridge. Responses recognised the importance of travel hubs as strategic infrastructure to support modal shifts away from private cars and to improve connectivity from rural areas to employment centres and existing transport networks. Comments reflected the importance of travel hubs serving new growth areas across Greater Cambridge, with some respondents also raising the importance of delivering smaller-scale travel hubs in villages, to improve connectivity to nearby Park and Ride Sites.

Various comments sought clearer definitions of the function, role and components that make up a travel hub. One respondent suggested that the policy should set out more clearly the differences between travel hubs and park and ride sites, in terms of their function and purpose within the transport network. Some responses indicated that the interchangeable use of the terms mobility hub / travel hub in the policy (and elsewhere in the Plan) was confusing. It was suggested by Cambridgeshire County Council that the policy should include reference to the Cambridge and Peterborough Combined Authority (CPCA) emerging Mobility Hubs Strategy.

Concerns were raised that the policy was too focused on intensifying existing travel hubs, specifically existing Park and Ride (P&R) sites, indicating that undue precedence was given to P&R facilities. Some felt that relocating and/or expanding existing P&Rs would only provide a sustainable alternative for part of people's journeys. Respondents were also concerned that the existing road

networks would not have capacity to sustain increased volumes of traffic as a result of expansion. Several responses called for the policy to go further by explicitly promoting a modal shift away from car use and to ensure that new travel hubs are integrated into existing active travel routes. One response highlighted the importance of safeguarding land at the earliest stages where new locations for travel hubs are identified.

Various comments were received surrounding the delivery, design and management of travel hubs, including: the need for maintenance and management plans to be included with proposals; the importance of setting clear car and cycle parking standards based on objectively determined need rather than forecast demand; the delivery of specific features and components including public toilets, electric vehicle charging interchange infrastructure and lighting to support public safety and other supporting facilities. The importance of travel hubs facilities being fully accessible and incorporating step-free access was also raised.

Comments were also received around site-specific travel hub proposals that are set out in CPCA Local Plan Transport and Connectivity Plan and in respective growth area/site proposals in the Local Plan. Support was received for A11 travel hub proposals, as well as proposals for new hubs at Foxton station and Whittlesford Parkway to serve key employment areas and growth areas. Proposals were also received for the delivery of a travel hub at Rectory Farm to relieve pressure at Madingley Road Park and Ride or replace the site.

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

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

Since the Regulation 18 consultation on the Draft Local Plan, the Councils have been working with CoMo UK and CPCA on the emerging Mobility Hubs Strategy and Delivery plan which, once adopted, will be a sub-document to the Local Transport and Connectivity Plan. The emerging Mobility Hubs strategy and delivery plan provides details of the various typologies of mobility hubs and essential and desirable components for each type of mobility hub, including an overview of potential mobility hub locations in the CPCA area. In March 2026, government guidance around delivering quality mobility hubs was published. This guidance sets out the concept and purpose of a mobility hub and the process from which they can be delivered. Based on this updated evidence, and reflecting the broad themes emerging from the representations, the Councils took the decision to recast the policy to better align with emerging strategy and national guidance. The policy name has therefore been amended to the I/MH 'Mobility Hubs' and now focuses on the mobility hubs model. Conceptually a mobility hub is similar to a traditional transport interchange, however, the mobility hubs model is more focused on bringing together multiple transport components including active travel, shared transport and public transport services and integrating in non-transport components such as community facilities. The policy promotes the delivery of new mobility hubs across all scales including district and neighbourhood level that integrate into existing mobility networks. It is through the expansion of the network that individuals have greater opportunity to make multi-modal trips to their destinations, which in turn will increase modal choice and promote a shift away from private car use.

The Councils acknowledge that the policy as previously proposed was too focused on the enhancement of P&R sites. The policy has been revised to ensure that it not only supports proposals to integrate these sites into wider mobility hub networks but also enable opportunities to enhance other existing interchanges, including bus and railway stations. The aim is to ensure that existing transport infrastructure is integrated into the mobility hub network alongside more localised hubs that will be delivered as part of proposed strategic allocations.

In response to the emerging Mobility Hubs strategy, new national guidance and comments made through the Reg 18 consultation, the revised policy establishes criteria for essential components to be delivered as part of all mobility hub proposals, and other facilities which may be appropriate subject to the scale and context of the scheme. Reflecting comments received, criteria have been added to secure appropriate management and maintenance agreements, cycle parking and car parking (as appropriate to the scale and location of the proposal). The design of mobility hub needs to respond to the location both in terms of the type of components and their scale. The policy makes clear that not all components will be necessary subject to the scale of the mobility hub being delivered.

Regarding issues around increased traffic, as part of a planning application a vision-led Transport Assessment which identifies and sets out appropriate mitigation measures to address the transport impacts would be required.

The importance of safeguarding land to deliver of new mobility hubs is acknowledged. The Councils' approach to safeguarding important transport infrastructure is set out in Policy I/SI Safeguarding Important Infrastructure and the relevant section of the Infrastructure Topic Paper. Individual policies associated with the proposed strategic site allocations elsewhere in the Local Plan set out where proposals must safeguard land for and deliver mobility hubs as part of the development.

We note the identification of the Rectory Farm site as a potential location for a travel hub; however, this would be a matter for the strategic transport authority to consider as part of the preparation of the Greater Cambridge Transport Strategy and the next statutory Local Transport Plan.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Rectory Farm site (2025 Call for Sites reference 222cfe) is proposed as an ideal location for a new travel hub, which could relieve pressure on Madingley Park-and-Ride and free that site for housing or employment development. The proposals are comparable to the Cambridge South West Travel Hub, which has received planning permission and is progressing with enabling works.	202045, 206073, 206074, 206078, 206094, 206099, 206101, 206102 (Wimpole Associates Ltd)
Local Transport Infrastructure like a travel hub should also be considered appropriate development within the Green Belt, as per paragraph 154 criterion h (iii) of the NPPF (2024).	202045 (Wimpole Associates Ltd)
Park and Ride should be the default option for transport into Central Cambridge.	201048 (P Spowart)
All schools should be required to provide buses for their pupils from the P&Rs.	201048 (P Spowart)
Buses should not always go into Cambridge - how about a ring service to connect Cambridge South station, north west Cambridge villages on the A14 corridor and the Science Park, for instance?	201048 (P Spowart)
The main concern is the impact on the roads and the volume of traffic around the Four Wentways roundabout and the A1307 in the surrounding area which is already beyond capacity at peak travel times.	201315 (Shudy Camps PC)
The Policy and supporting paragraphs give undue precedence to P&R facilities. Building new and expanding existing P&Rs promotes car dependency by encouraging driving to those P&R's and merely provides a more sustainable alternative for part of the journey.	201649 (Stapleford PC), 201845 (T Mckeown), 210960 (Great Shelford PC)
Travel Hubs and Travel Hub facilities must be appropriate to the location. We would support them in principle at Whittlesford Parkway, where there is currently an underused station.	201649 (Stapleford PC), 210960 (Great Shelford PC)

<p>P&R travel hubs promote car dependency. Would like to see the policy assisting sustainable modes from Rural Centres and Minor Rural Centres, including the following:</p> <ul style="list-style-type: none"> - Village travel hub where cycle parking is provided by bus stops. - Improved walking and cycling connections within villages to make accessing bus routes easier. - Improved cycling connections from villages to P&R sites for multi-mode trips without private motor vehicles. Provision for local shuttle buses from village bus stops for onward travel interchange at P&R sites. 	201845 (T Mckeown)
<p>While I strongly support a transport network based on Travel Hubs, the policy must clearly define a travel hub's nature and purpose and recognise that park and ride sites generally serve different functions. Travel hubs should be proactively planned and delivered as a connected network, with every railway station, urban centre, and retail centre provided with one from the outset as foundational infrastructure, not left to speculative proposals. The restrictions in section 2.a are unhelpful, as successful hubs must integrate seamlessly with other viable uses. Section 2.e misunderstands appropriate locations, and section 3 should ultimately seek to replace Park and Ride sites.</p>	203577 (P Tribble)
<p>Travel hubs should facilitate safe and comfortable walking access to residents within a 30-minute walk of a site, they should not only serve visitors arriving by car, bus or cycle.</p>	201525 (S Houlihane)
<p>New locations need land safeguarded at an early stage. Such as early stage that challenges as to viability can be readily made. There may need to be much more assertion, so that space that needs to be available is safeguarded, so that it is there for the future. As usual in planning it all comes down to weight given to competing options. That has to be for the ambition of the planning authority. This policy needs to be more aggressive else the ambition will not be met.</p>	201666 (G Duck)

Since any sort of hub would need a maintenance and management plan, the policy should require inclusion of details about how they are managed and by whom.	202521 (University of Cambridge)
Provision at such sites should include EV charging for bus services and driver rest facilities and interchange between 'normal buses' and park and ride services.	202521 (University of Cambridge)
To be consistent with policy I/ST the list of amenities in para 10.18 should include public toilets.	203609 (Cambridge City Council Liberal Democrat Group)
Travel hubs are an indication of planning failure. They are required when people don't live in places which have the amenities they want, and don't have suitable public/active transports to take them from their homes to those amenities. The plan should focus on how to eliminate the need for travel hubs, rather than trying to use them to address its own failures.	203622 (H Thomas)
The policy would benefit from stronger and clearer commitments to accessibility and sustainability. Travel hubs should explicitly include accessible parking and facilities to ensure disabled people who cannot use public transport are not excluded	203755 (Cambridge Green Party)
References to "safe and secure" cycle parking should be expanded to set clear expectations for genuinely secure provision, informed by best practice and consultation with local cycling organisations.	203755 (Cambridge Green Party)
The policy should encourage travel hubs to be developed or redeveloped using sustainable, low-carbon and environmentally responsible construction methods wherever possible.	203755 (Cambridge Green Party)
Active Travel and PROWs and perimeter routes should be bridleway so that provision is inclusive or horseriders.	204076 (S Rogers)

Currently there is inconsistent use of the terms 'mobility hub' and 'travel hub', with a preference for 'Travel (mobility) hub' for clarity.	204343 (Cambridge Past, Present Future)
Policy I/ST's definition of a mobility/travel hub should clarify that it does not include traditional Park & Rides, which are inefficient and carbon intensive.	204343 (Cambridge Past, Present Future)
The number of parking spaces at a Travel Hub should reflect assessed need, considering local dwellings and active travel infrastructure. The Councils should prescribe maximum and recommended numbers of parking spaces at Travel/Mobility hubs, based on objectively determined need rather than forecast demand.	204343 (Cambridge Past, Present Future)
Parking charges should be implemented to manage demand and ensure availability for those who need parking.	204343 (Cambridge Past, Present Future)
The definition of a travel hub should facilitate interchange between Sustainable Modes of Transport and include essential facilities.	204343 (Cambridge Past, Present Future)
The current definition of Sustainable Modes of Transport should be revised to clarify the inclusion of multi-occupancy vehicles and their sustainability.	204343 (Cambridge Past, Present Future)
Travel Hubs must integrate with Girton's Active Travel priorities, not encourage increase increased car travel or sever community areas	202269 (Girton PC)
Tritax recognise its role in supporting the development of new travel hubs and the improvement of existing sustainable transport infrastructure to deliver modal shift away from private car use in line with Local Plan objectives and direction of travel.	204552 (Tritax Big Box Developments)

<p>Tritax Park, Cambridge, is currently exploring options for sustainable transport enhancements, including the potential for a travel hub facility and the rerouting of bus services to better integrate with wider active travel and public transport networks.</p>	
<p>Travel Hubs must connect directly to safe cycle links. Hubs must support vulnerable users and school routes.</p>	207167 (Girton PC)
<p>Ensure any travel hub upgrades align with Active Travel corridors (DG2/3, Eddington, Histon).</p>	207168 (Girton PC)
<p>The policy should prioritise safety, lighting and segregation and avoid car-dominant hub expansion within the parish.</p>	207168 (Girton PC)
<p>Rapid deployment of modular Smart Travel Hubs that enhance Greenways, P&Rs, connect villages by integrating shared passenger and cargo vehicles, secure micromobility parking, charging, and lightweight shelters within existing footprints. These hubs complement core public transport by solving first/last-mile access, supporting inclusive mobility, and enabling low-carbon local trips and deliveries. Using smart tech, solar power, and recyclable materials, our compact designs improve user experience and increase safety and security. The hubs extend safe day-to-night site use for commuters, workers, and visitors, reducing car dependency and congestion - deliverable quickly, cost-effectively, aligning directly with Greater Cambridge's objectives for sustainable, integrated transport.</p>	205423 (Cambridge Electric Transport Limited)
<p>The Policy could refer to CPCA emerging strategy work Mobility Hub Strategy and need to strengthen links with EV charging infrastructure.</p>	210581 (Cambridgeshire County Council)
<p>The policy is set out well. However, this for new locations needs land safeguarded at an early stage. Such as early stage that challenges as to viability can be readily made. There may need to be much</p>	201666 (G Duck)

<p>more assertion, so that space that needs to be available is safeguarded, so that it is there for the future. As usual in planning it all comes down to weight given to competing options. That has to be for the ambition of the planning authority. This policy needs to be more aggressive else the ambition will not be met.</p>	
<p>These contributions should also be referenced in relation to the impact on energy consumption impact within the Greater Cambridge area from large scale neighbouring authority large infrastructure projects (National Infrastructure Projects) at Tempsford/EastWest rail station (30,000 houses and interchange EW rail station)</p>	201394 (Gamlingay PC)
<p>Unsustainable local infrastructure, with large housing developments continuing in Haverhill and surrounds making this junction too busy already. Development will cause unnatural and damaging change to surrounding local environment.</p>	201893 (I Webb)
<p>Support the role of travel hubs as strategic components of the sustainable transport network and considers them to be particularly important in the context of town extensions, which are a key component of the local plan development strategy.</p> <p>It is suggested that an additional criterion is added under part 2, i.e as clause (g) for the following lines to include accessibility of facilities: “(g) they incorporate inclusive and step-free access between transport modes, appropriate lighting and natural surveillance”. This would strengthen the effectiveness of the policy, whilst also ensuring that the delivery of these travel hubs are future proofed and inclusive of wider population needs.</p>	207027 (Mac Mic Land)
<p>The Greater Cambridge Partnership proposals for rail-based travel hubs must be fully implemented. Foxton Station: the proposed travel hub intercept car journeys along the A10 into Cambridge,</p>	208031 (Railfuture East Anglia)

<p>particularly for trips to the Biomedical Campus, Cambridge Central Station area, Cambridge North, the Science Park, and Waterbeach. Whittlesford Parkway: A similar travel hub should be delivered here to intercept vehicle movements from the south-east of Greater Cambridge and to serve the nearby Genome Campus, as well as the M11 motorway.</p>	
<p>McDonald's Restaurants Ltd supports the proposed role of Travel Hubs. The role of Travel Hubs can be enhanced through the provision of suitable, well used, supporting facilities, such as a takeaway. Such provision will provide an additional level of service for people when using the Travel Hub, allowing the public, commuters and tourists the opportunity to get some refreshments before or after using the bus. The definition of supporting facilities should be broadened within paragraph 10.18 to include takeaway facilities, which can cater for breakfast, lunch and dinner, along with coffee.</p>	<p>207981 (McDonald's Restaurants Ltd)</p>
<p>It is recognised that it is important that the Local Plan supports the development of new travel hub sites in order to optimise their contribution towards delivering modal shifts away from private car use in line with the adopted Transport Strategy objectives.</p>	<p>208273 (Martin Grant Land Limited)</p>

Policy I/CV: Cycle and vehicle parking

Abbreviations

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

Summary of Main Issues:

Comments were made in support of car free developments or lower levels of car parking, particularly within and to enable higher density developments, when paired with measures to enable and encourage use of public and active transport. Some suggested keeping car parking to an absolute minimum to discourage car ownership and use, that it should only be available as an option with significant extra costs, and that there should be monitoring of usage post-occupation in major developments, with mechanisms for reallocating space.

Some commented that the minimum cycle parking requirement should be raised and sought greater clarity on the design criteria to ensure provision is well located and designed to be secure, safe and accessible for all users, including ensuring sufficient provision (5-20%) to accommodate non-standard cycles and avoiding the use of two-tier stands.

Comments in relation to electric vehicle charging suggested the policy should promote electric vehicles as a sustainable mode of transport, that charging infrastructure should be future proofed to accommodate increased demand, that consideration needed to be given to charging delivery lorries and refuse trucks, and that the policy does not provide for home charging in properties without off-road parking and the need to avoid obstruction on pavements. Support was expressed for the requirement of a site-wide electric vehicle charging strategy for large-scale developments.

Comments were received raising points of clarification around the interpretation of the policy elements, and in relation to the application of mobility scooters, suggesting further guidance was needed. Other issues raised include the need for parking enforcement, space for car club vehicles, provision for taxi drop-off spaces (with appropriate charging facilities), management of e-scooter and e-bike parking.

Response to the main issues raised in representations

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

Car and cycle parking should be determined on a site-by-site basis using a vision-led and design-led approach. Additional clarity has been added around the range of factors that should be considered in determining appropriate levels of provision, including the scale, density and mix of development, the frequency of public transport and availability of active travel routes. The policy also clarifies that car-free or car-capped development will be acceptable in certain circumstances, and consider opportunities to reduce levels of car parking.

The proposed cycle standards are a minimum requirement and higher levels may be appropriate as determined on a site-by-site basis using a vision-led and design-led approach. Further clarification has been added to the policy wording and supporting text to ensure cycle parking is at least as convenient as car parking, accessible and suitable for people of all abilities and designed appropriately, particularly in sensitive locations. This includes limiting the use of two-tiers stands, how parking should consider the different needs of users including clarification of non-standard cycles, and how it should be sympathetically integrated into the streetscene and residential developments. Larger developments are required to ensure appropriate space for micromobility modes such as dockless cycles.

The policy requires electric charging provision in accordance with Building Regulations. Further guidance has been added to the supporting text to guide the type and power output of chargers, and to ensure their design avoids street clutter and conflict with other highway users.

Further clarification has been added to the policy on the interpretation of policy elements, including guidance around the design of car parking and provision for drop-off/pick-up and car clubs. In response to comments received, a new requirement has been added to the policy requiring appropriate storage space for micromobility modes such as dockless cycles and e-scooters to be provided where the proposal leads to increased demand.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for the policy, including:</p> <ul style="list-style-type: none"> • Support is expressed for a site-wide electric vehicle charging strategy for large-scale developments • Support strong policies promoting active travel • The policy’s support for sustainable travel is welcomed, and cycling is recognised as central to Cambridge’s character. 	<p>201974 (Swavesey PC), 202522 (M Parsons), 203610 (Cambridge City Council Liberal Democrat Group) 204583 (M Mckay)</p>
<p>Comments in support of lower levels of car parking:</p> <ul style="list-style-type: none"> • Higher density housing needs to be paired with lower levels of car ownership and strong alternatives to driving, to encourage use of public and active transport, and improve quality of life. • Parking should only be available as an option with significant extra costs, so that there is a financial benefit to people not owning cars. 	<p>201993 (D Langley), 202443 (R MacDonald), 204958 (Mothers CAN Cambridge), 205580 (Mothers CAN)</p>

<ul style="list-style-type: none"> • Parking space should be kept to an absolute minimum to discourage car ownership and use. Car sharing should be encouraged as far as possible. • Allow lower levels of car parking in developments where residents demonstrate willingness to be car-free or low car use through sustainability charters. • High parking availability raises housing costs, forcing non-car-owning households to subsidise parking through higher prices. • Plan should require optional parking, separated from housing, and transparently priced to ensure density is seen as an opportunity. • Parking should not have to feature in all developments, and developments should not assume residents have the "right" to keep a car. • Parking should be located separately from housing (perhaps underground), and priced transparently *and separately from housing* to encourage car-free-living. • The 'Transport assessment statement' should include car ownership levels compatible with climate change goals, avoiding a 'predict and provide' model based on unsustainable growth. • Large (car) vehicle parking must be an optional and exceptional add-on to all properties, with limited quotas and careful design to deter abuse by those inconsiderate of broader city needs. Instead, dense developments need to be built around, not just include, extensive storage for diverse wheeling and very light vehicles which are hyperlocal (not just nearby) and highly accessible, walking, and public transport. 	<p>Cambridge), 207587 (A Lawrence), 204916 (A Brown), 205580 (H Tardrew), 205397 (P Colledge)</p>
<p>Comments on car parking provision include:</p> <ul style="list-style-type: none"> • It is recognised that it is important policy clearly sets out the requirements for vehicle parking. • All new houses should have maximum 0.5 parking spaces per house and all electric vehicle provision. • Higher density development can be appropriate if supported by real infrastructure and services. However, removing parking without alternatives raises housing costs, pushes parking into surrounding streets, and penalises residents who cannot cycle or use public transport. Policy 	<p>202523 (H Brown), 208842 (D Smith), 210375 (Community Campaigner D Barton), 208274 (Martin Grant Land Limited), 208731</p>

<p>should be: flexible, location-specific, and responsive to real demand — not ideological targets. People should not be forced to pay for poor planning through inconvenience or reduced quality of life.</p> <ul style="list-style-type: none"> • Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness. • Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment. • Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs. • Minimising cars and car infrastructure inside developments due to the visual blight they cause. Not to say they should not be present but as much is possible I believe they should be pooled at the edge of developments 	<p>(Cllr M Morgan Cambs County Council)</p>
<p>Explicit outcomes for sustainable travel</p> <p>The Plan should require measurable outcomes for walking, cycling and public transport rather than relying on general support for sustainable travel.</p> <ul style="list-style-type: none"> • Major developments must be required to meet explicit mode-share targets for walking, cycling and public transport; • Clear car-trip reduction requirements must be set at the Plan level and applied consistently across major sites; • Trip budgets, where used, must be accompanied by binding mode-share outcomes and clear consequences if they are not met. <p>Transport carbon as part of net zero</p>	<p>209066, 209068 (Camcycle)</p>

The Plan's net zero approach must fully account for the carbon impacts of travel.

- Transport emissions must be included within net zero assessments, alongside operational and embodied building carbon.
- Development should be assessed on lifetime travel carbon, including the carbon impacts of car-dependent land use patterns.
- Electric cars should not be treated as a sustainable transport mode or a substitute for mode shift.
- The Sustainability Appraisal should be revised so it meaningfully differentiates between spatial options based on transport outcomes, including realistic mode share potential and lifetime transport emissions. The appraisal should not treat fundamentally different locations as broadly equivalent in sustainability terms.
- The Transport Evidence Report should be revised with a modelling approach to test higher ambition scenarios and policy levers, including Eddington-level mode share assumptions for edge of Cambridge sites, parking restraint, mandatory permeability, early delivery of high quality cycling networks, and stronger trip internalisation through mixed-use local amenities.

Mandatory layout and permeability standards

Good outcomes for walking and cycling depend on early layout decisions that cannot be left to later stages.

- Mandatory permeability standards should be introduced based on site size, requiring multiple direct walking and cycling connections.
- Development layouts must be required to support coherent, direct, safe, comfortable and attractive routes as a policy test.

<ul style="list-style-type: none"> ● Cul de sac layouts and single access sites should not be supported where they undermine sustainable travel. <p>Strategic walking and cycling infrastructure</p> <p>Strategic walking and cycling links must be treated as essential infrastructure.</p> <ul style="list-style-type: none"> ● Key walking and cycling connections must be secured through planning policy and conditions, not left to future funding rounds. ● Critical links, including bridges and crossings, must be identified, safeguarded and tied to development phasing. ● Development should not proceed where essential active travel infrastructure is not secured. 	
<p>High-density development should not assume private car ownership as the default.</p> <p>Draft Plan’s approach to cycle parking contains good principles, including that cycle parking should be as convenient as car parking, step-free, well-lit and easy to use. However, the supporting expectations risk being undermined by an overly simplistic focus on the quantities of parking and by allowing very high proportions of two-tier stands.</p>	<p>209070, 209072, 209073, 209074, 209075, 209076</p>

<p>Cycle parking requirements must be worded to maximise the convenience, accessibility and attractiveness of cycling facilities.</p> <ul style="list-style-type: none"> • Control the proportion of two-tier parking, with a clear presumption that single-level stands are the default and two-tier requires justification • Require equivalence with car parking in both location and journey quality, including step-free access and minimal barriers • Limit reliance on detached cycle hubs by requiring convenient destination cycle parking at, or directly adjacent to, building entrances <p>Separate accessible cycle parking from oversized cycle parking, with a minimum of 5% for each on larger sites.</p> <p>Camcycle is also concerned about the growing use of mobility hubs to group cycle parking in one place within larger developments, away from the individual buildings which users are seeking to access.</p>	
<p>Comments in relation to cycle parking include:</p> <ul style="list-style-type: none"> • It is recognised that it is important policy clearly sets out the requirements for cycle parking. • Policy does not mandate the provision of cycle parking • Allows for 90-95% of cycle stands to be double-stacker stands, which is unacceptable – control their use, only permit them only in constrained city centre locations where justified • Establish a higher minimum provision level • Specify a minimum spacing of 1m between stands, necessary to prevent unusable layouts • In family-oriented areas, cargo or oversized bikes often replace cars for school runs and shopping. The proportion of parking for non-standard bikes should be higher for family units, with secure, enclosed cargo bike spaces to reduce car dependency. 	<p>201171 (M Lucas-Smith), 203610 (Cambridge City Council Liberal Democrat Group) 203756 (Cambridge Green Party), 204532 (D Potts), 204786 (R De Beaux), 204958 (Mothers CAN Cambridge), 204960 (K Brightwell), 205141 (J</p>

- Requiring safe, secure and convenient cycle parking, is particularly important and should be supported by a clear commitment from the council or site manager to ongoing maintenance and management before locations are agreed.
- Separate accessible cycle parking from oversized cycle parking, with suggestions for ensuring a minimum of 5-20% for each on larger sites
- Oversized parking is also essential, for example for cargo cycles, cycles with trailers, adapted cycles, and longer or wider cycles.
- Ensure equivalence with car parking in terms of location and journey quality, including step-free access and minimal barriers
- Limit reliance on detached cycle hubs by requiring convenient cycle parking at or adjacent to building entrances
- Establish clear security and personal safety standards, including properly secured stands and good lighting, to prevent cycle theft
- Support for cycle parking provisions, with a recommendation to future-proof requirements for growth in cycling without additional planning applications.
- A wide variety of bikes, such as cargo bikes should be accommodated. Suggestion to specify 'non-standard cycles' in policy.
- Concern is raised about the expectation for cycle stores to be located at the front of every dwelling, which can be impractical or harmful in constrained urban sites, conservation areas, or where better access exists from the side or rear. The requirement is therefore considered overly restrictive, and it is recommended that greater flexibility is allowed, with cycle storage assessed on a case-by-case basis based on convenience and context.
- Take a more flexible approach to cycle parking which takes into account the projected employment demand for cycle parking on the basis of trip generation and monitoring, rather than a fully workplace-based workforce.

Grantham), 205333 (S Nuttall)
 205337 (A Williams), 205617 (A Williams), 204583 (M Mckay), 205141 (J Grantham), 202523 (H Brown), 204916 (A Brown), 203592 (The Crown Estate), 203756 (Cambridge Green Party), 209072, 209073, 209074, 209075, 209076 (Camcycle), 204902 (Hill), 208274 (Martin Grant Land Limited), 211408 (Persimmon Homes East Midlands)

<ul style="list-style-type: none"> • Where level changes are required, ramped access should be the preferred solution. Shallow stepped routes may be acceptable only where they are accompanied by convenient accessible and oversized parking on the ground floor, or by lifts suitable for wheeling cycles in and out. Where a lift-only solution is proposed, a minimum of two suitably-sized, walk-in/walk-out lifts should be provided to ensure resilience. • Para 2h should be revised to accommodate cycle parking provisions for various residential types, such as flats and maisonettes, where traditional placements are not feasible. • More specificity is sought on 5-10% non-standard parking for minor developments 	
<p>Comments on points of clarity in relation to mobility scooters:</p> <ul style="list-style-type: none"> • that the paragraph regarding mobility scooters is unclear, particularly whether the requirements pertain to mobility scooters or if covered parking applies to non-scooter users • it is unclear whether the proposed provision for mobility scooter storage and charging is sufficient, and further justification or guidance would be helpful. • We recommend that Limb 4 of the policy is refined to apply specifically to specialist forms of accommodation, such as extra care, sheltered housing or other developments designed for older or disabled people, where mobility scooters is clearly required. For general residential development, provision should be determined on a case-by-case basis through design and accessibility standards or apply specifically to the provision of Category M4(3) housing. 	<p>201171 (M Lucas-Smith), 203756 (Cambridge Green Party), 211409 (Persimmon Homes East Midlands)</p>
<p>Comments raising points of clarification:</p> <ul style="list-style-type: none"> • Paragraph 5 uses the term 'parking' ambiguously, necessitating clarification on whether it refers to car parking or other types. • Comment that the policy lacks clarity regarding the standards for car parking and should include guidance as a starting point, similar to the approach taken for cycle parking • Request for clarity on whether certain points relate to car or cycle parking, emphasising the need for clear specifications on the number of spaces. 	<p>201171 (M Lucas-Smith), 202522 (M Parsons), 204958 (Mothers CAN Cambridge), 201392 (Gamlingay PC), 202523 (H Brown), 202574 (P Tribble),</p>

<ul style="list-style-type: none"> • Parking standards should be made clear - policy appears muddled and a tabular form would be clearer. • Clarification in relation to the policy required for 'appropriate charging facilities' whether this solely relates to charging provision for mobility scooters, or whether it also encompasses electric vehicle charging infrastructure for cars and other vehicles • Policy is unclear, is the provision for 'spaces' car parking spaces or bike spaces. • Section 4 specifies minimum spaces, but does not state what they're spaces *for*. The text implies mobility scooters, but that's clearly inappropriate. If cars, the provision is clearly too high and would lead to car-dominated development in violation of the Plan's core vision. • Part 3 a - what is a non-standard cycle? • There appears to be a table under Part 4 - is that a car parking ratio table? • The use list under item 4 is unclear for car, cycle or mobility scooter parking. • Clarification is sought on the threshold for large-scale major developments regarding the submission of a site-wide electric vehicle charging strategy 	<p>205110 (Abbey Properties Cambridgeshire Ltd), 201714 (K Mak), 210271 (Vistry Group), 204902 (Hill)</p>
<p>Comments in relation to electric charging:</p> <ul style="list-style-type: none"> • Your proposals DO NOT 'promote all forms of sustainable transport' - you do not promote electric vehicles. Focus is on slowing traffic and reduced parking. • Parking stress already affects Girton; EV strategies must not worsen congestion or obstruct pavements. Require EV infrastructure that does not obstruct pavements. Prioritise mobility-impaired safety and school routes. Encourage EV charging at hubs, not along narrow streets. • The policy should allow a balanced mix of active and passive EV charging provision, consistent with national guidance; provide flexibility for strategic sites to vary parking standards across phases; ensure alignment with grid capacity constraints. • Support is expressed for a site-wide electric vehicle charging strategy for large-scale developments, detailing charge point locations, phasing, and grid capacity. However, the 	<p>201241 (S Williams), 202270 (Girton PC), 202522 (M Parsons), 205029 (M Cleminson), 205196 (M Evans), 201392 (Gamlingay PC), 210345 (East of England Ambulance Service NHS Trust), 208995 (Barrat</p>

<p>University notes a decline in the need for charging associated with staff parking due to increased home charging and improved battery technology.</p> <ul style="list-style-type: none"> • Query whether it is reasonable or necessary as part of the electric vehicle strategy for developers to demonstrate grid capacity for large-scale sites given that confirmation around network capacity falls within the remit of the relevant utility provider. • EV charging infrastructure should be future-proofed to accommodate increased demand, and developments should avoid excessive car parking provision which encourages car dependency • Policy does not provide for home EV charging for properties with no scope to park in their front gardens, including terraced housing. Policy needs to allow for cables to be laid temporarily across the pavement under cable trays • Further consideration is needed for the need to electrically charge delivery lorries, and refuse trucks- essential to build in electric charging for all new commercial/industrial building applications throughout the district. • To support move to Carbon Net Zero EEAST would request an EV charging strategy is developed to enable public organisations to have access to centralised EV charging locations. Local authority, health, social and emergency vehicles should maximise usage of each other's charging resources such as those provided by private providers and bus companies. They would need to be of sufficient width to accommodate these vehicles and be without penalty for repeated usage. 	<p>Homes Northampton), 210272 (Vistry Group),</p>
<p>Enforcement of parking regulations is critical, and poorly delivered across the city at present. A parking enforcement plan should be specified in every transport assessment, specifying frequency of monitoring, number of additional parking attendants required, etc.</p>	<p>202443 (R MacDonald)</p>

Comment that the policy should also include provision for taxi drop-off spaces, and for larger developments, taxi ranks near travel hubs or stations. Also, EV charging facilities should be provided for taxis and visitors to support sustainable transport.	203610 (Cambridge City Council Liberal Democrat Group)
Comment that the policy does not address the management of e-scooter and e-bike parking and drop-off areas, which currently present significant accessibility challenges, particularly for disabled people, and should be explicitly planned for within developments.	203756 (Cambridge Green Party)
Recommendation for monitoring parking provision and usage post-occupation in major developments, with mechanisms for reallocating space to sustainable modes if car parking demand is lower.	204958 (Mothers CAN Cambridge)
Request for inclusion of car club space requirements in the policy.	204958 (Mothers CAN Cambridge)
Support the minimum size for garages 3.3m*6m for car and adding 1m for cycles within the garage.	201392 (Gamlingay PC)
Section 2.h conflicts with Policy H/SS (the commentary in 9.47 which talks about the amenity space including space for a garden shed for bicycles).	202574 (P Tribble)
Significant provision for pooled e-car and e-micro-car facilities should be required for large developments. E-micro-cars AKA 'Quadricycles' with lower ranges, lower top speeds, and less powerful engines weigh less and do far less road damage, while meeting the needs of those who only need to do short journeys.	203821 (A Carpen)
This policy needs to be proportionate to the scale of development proposed and should recognise the differences between Transport Statements and Transport Assessments.	203396 (ESCO Prospect)

<p>Comment that the policy should be renamed to reflect its content, including cycle parking, car parking, and electric vehicle charging</p>	<p>201171 (M Lucas-Smith)</p>
<p>There is not enough focus on emissions from transport:</p> <ul style="list-style-type: none"> - We should be challenging employers to only allow EVs to be parked at work for employees earning more than a certain amount - Much more needs to be done to encourage car clubs. There should be at least one car club EV in each of the Cambridgeshire villages. - Active transport should be a much higher priority. It is much lower carbon than even EVs, reduces congestion and has significant health benefits. Cycle paths need to be higher quality (LTN1/20), more numerous, better maintained and gritted 	<p>204988 (S Webster)</p>
<p>Electric vehicles are not a perfect solution, but they are a meaningful part of the transition, especially for: people with mobility issues, shift workers, families with caring responsibilities, rural and semi-rural residents. Reducing emissions should focus on: reducing avoidable trips, improving traffic flow (not worsening congestion), supporting cleaner vehicles, and aligning homes, jobs and services more sensibly. Punitive approaches that slow journeys, force detours, or increase congestion risk increasing emissions, not reducing them.</p>	<p>208838 (D Smith)</p>
<p>The policy must be applied with sufficient flexibility to respond to evolving travel behaviours, technological change and advances in vehicle charging infrastructure over the plan period. Flexibility is also required to reflect the specific characteristics of individual sites, including their location, accessibility to public transport, availability of active travel options and existing cycle infrastructure.</p>	<p>210270, 210271 (Vistry Group)</p>

<p>The policy would be more effective if it clearly recognised that car parking and EV charging provision must respond to the specific characteristics of individual sites. Large or complex developments often have distinct operational requirements, travel patterns and accessibility constraints that cannot be addressed through uniform or prescriptive standards. The policy should therefore adopt a proportionate, evidence-based and site-specific approach, consistent with national policy, to support sustainable transport objectives without undermining development viability or deliverability.</p>	<p>204165 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)</p>
<p>The policy should be amended to ensure proportionality and flexibility. Transport Statements should only be required where appropriate, with minor schemes allowed to address transport matters through Design and Access Statements. The requirement for 5–10% non-standard cycle parking and one space per bedroom should be justified or removed. Cycle parking standards should be less prescriptive and reflect different urban and rural contexts. EV charging requirements should be deleted as they duplicate Building Regulations. Part 2(h) should allow cycle storage in the most secure and appropriate location (front, side or rear), including rear gardens, to support inclusive, design-led solutions.</p>	<p>204623 (Redrow South Midlands)</p>
<p>The policy would be more effective if it clearly recognised that car parking and EV charging provision must respond to the specific characteristics of individual sites. Large or complex developments often have distinct operational requirements, travel patterns and accessibility constraints that cannot be addressed through uniform or prescriptive standards.</p>	<p>204564 (Tritax Big Box Developments)</p>
<p>The policy has been significantly watered down and we object to this. The standards were updated in 2018 from the previous Local Plan precisely because developers consistently installed cycle racks which were difficult, sometimes impossible, to access in terms of spacing, poorly located, or required users to use steep ramps or lift their bikes. There is no explanation of why elements have been</p>	<p>210526 (Cambridgeshire County Council)</p>

<p>removed which are essential to ensure high quality cycle parking for all new developments. The topic paper suggests that in combining the Local Plans from 2018 simplicity has been prioritised whilst favouring more cycle parking, but this simplicity will result in the poor provision that was a common feature of pre-2018 cycle parking.</p>	
<p>Policy would benefit from reference to both CCC and CPCA Active Travel Strategies.</p>	<p>210582 (Cambridgeshire County Council)</p>

Policy I/SD: Servicing and last-mile deliveries

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy's aim of promoting sustainable servicing and last-mile delivery solutions to reduce congestion, improve air quality and lower emissions. Comments generally welcomed the emphasis on delivery consolidation, micro-hubs and innovative approaches to freight and logistics.

Some sought a stronger focus on sustainability and decarbonisation, with comments suggesting that Delivery and Servicing Plans should explicitly consider climate objectives and apply a sustainable servicing hierarchy. Support was expressed for the use of cargo bikes, e-cargo bikes, electric vehicles and other low-emission delivery methods. Some comments also highlighted the potential role of rail freight, freight exchange methods and edge-of-settlement consolidation hubs in reducing road-based freight movements.

Support was expressed for local parcel lockers, local collection points and other infrastructure that could reduce unnecessary delivery journeys and improve convenience for residents. Some comments also highlighted the importance of ensuring consolidation centres have suitable charging and electrical infrastructure to support electric vehicle fleets.

Concerns were raised regarding the impact of servicing and deliveries on local communities. Comments emphasised the need to avoid congestion and pavement obstructions, and maintain wheeling and cycling routes, particularly when located near schools.

Requests were made for safe, unobtrusive servicing solutions and carefully designed servicing arrangements that minimise impacts on residents and active travel users. Concerns were also expressed around the cumulative transport impacts of logistics activity, including increased HGV and delivery vehicle movements, pressure on local roads and infrastructure, and lack of adequate HGV parking provision.

Further representations sought greater flexibility regarding the policy's approach to consolidation facilities, including support for larger-scale facilities and rural or edge-of-settlement locations where these could deliver sustainable logistics benefits.

Overall, comments generally supported the policy direction whilst seeking stronger sustainability requirements, measures to reduce local impacts and greater flexibility in the delivery of logistics infrastructure.

Response to the main issues raised in representations

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

The Councils recognise the increasing importance of the planning system in promoting more innovative and sustainable approaches to deliveries and servicing, recognising that the fundamental shift towards the use of online businesses has led to both benefits to individuals, in terms of speed and convenience, but also wider societal challenges arising from increasing numbers of delivery movements. A number of these challenges have been highlighted in responses received through the Regulation 18 consultation on the Draft Local Plan, including safety, emissions and congestion. Notwithstanding the broad support expressed by representations on the general emphasis of the policy, focused changes have been proposed in response to general feedback that the policy could go further in promoting a focus on sustainability and decarbonisation. These are designed to ensure that a range of alternative approaches and emerging technologies are considered more proactively by applicants when considering appropriate

servicing and delivery arrangements. While the previous version of the policy already emphasised the importance of safe delivery and servicing arrangements, this has been further clarified in the proposed policy, with location-specific challenges put forward in representations (including active travel routes and schools) highlighted more prominently in the supporting text. Noting comments received in relation to specific villages, it is not the role of this policy to prohibit final-mile delivery routes in particular locations, but to set a general framework through which local context can be taken into consideration in assessing proposed delivery and servicing arrangements, including delivery routes. Focused changes have been made to the supporting text of the policy to clarify the intent.

The Councils note the range of specific measures suggested that can contribute to sustainable servicing and deliveries. Reflecting that a range of different solutions will need to be deployed in different contexts, the policy does not dictate a ‘one size fits all approach’ or aim to limit the range of measures that could be utilised to achieve safe, sustainable and low emission servicing and deliveries. Several of the measures frequently mentioned in representations, such as delivery lockers, micro-hubs, electric vehicles and cycle couriers, are already explicitly mentioned and prioritised in the policy. While others are not identified explicitly, such as rail freight and rural or edge-of-settlement logistics hubs, their deployment is not precluded should they support the delivery of the policy and comply with the criteria established.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
As part of the vision for reducing emissions and road transport, the policy should include support for servicing by rail in suitable locations.	202630 (P Tribble)

<p>We support this policy but believe that the Delivery and Service plan required for proposals should explicitly require that climate targets are considered, and a sustainable servicing hierarchy should be used.</p>	<p>204961 (Mothers CAN Cambridge)</p>
<p>Servicing must not increase pavement obstruction, congestion, or conflicts with Active Travel, especially near schools. Key Points: Girton faces narrow pavements and constrained junctions. Last mile servicing should be cycle compatible. Distribution activity must avoid increasing severance. GPC Requests: Require safe, unobtrusive servicing solutions. Encourage e-cargo, micro-hubs, or off-street delivery points. Design servicing away from school approaches.</p>	<p>202271 (Girton PC)</p>
<ul style="list-style-type: none"> • Provision should be made for freight exchanges on the edge of Cambridge (and new towns) to enable local cycle/-ecycle couriers to undertake last mile deliveries, reducing the motor traffic of heavy vans. • Provision should be made to charge for the facilities - which in the longer term equalises the playing field with the high street. • Provision should be made for allied/additional facilities such as 'micro-e-car-hire' AKA 'Quadricycles' which are e-cars with shorter ranges, lower top speeds, and less powerful engines that otherwise meet the needs for short journeys and do far less road damage. 	<p>203819 (A Carpen)</p>
<p>It is essential that parking bay provision is made at the front of properties for couriers: If it at the rear of premises the couriers will not use it. Holding up traffic causes more pollution and impacts upon the efficiency of the economy and costs to the economy. These poor people work long hours, are under time pressure, and need all the help they can get.</p>	<p>202378 (S Hegarty)</p>
<p>Can't see mention of lockers, I would hope planning authority would be supportive of proposals to install lockers in communities to avoid unnecessary car journeys.</p>	<p>204052 (Histon and Impington PC)</p>

<p>Currently many unnecessary journeys to Milton where Tesco's hosts lockers, would like to see accessible space in new towns and strong support for installation of lockers in existing communities.</p>	
<p>As noted, online shopping peaked during COVID lockdown. However, the demand for home delivery seems to be tailing off as residents return to working in the office. Care should be taken to ensure "last mile" delivery proposals reflect current needs, not following 5-year-old statistics.</p>	201413 (Cllr P Sandford)
<p>Traffic – Strong concerns re cumulative impact on local villages</p> <ul style="list-style-type: none"> • Increase in volume of traffic, both HGVs, delivery vehicles and cars (employees). • Increase in rat-running of vehicles through villages alongside the A14. • Concerns over integrity of A14 flyovers, which are already sinking under existing traffic flows. • HGV parking – causing issues and dangers in and around villages and the A14. Additional HGV parking is vital for any consented development. • Cumulative impact of increased traffic from already consented housing developments in this area, as well as proposed development including business and warehouse parks is required. • A1307 – Local road, concerns over cumulative increase in traffic volume • A1307 should not be used as an access road to/from a development park. It was provided for local access, to keep local traffic off the A14 and allow a safer route for local residents. 	201976 (Swavesey PC)
<p>The policy should require consolidation of deliveries and the use of cargo bikes or electric vehicles for last-mile delivery wherever feasible. This is essential to reduce congestion and emissions.</p>	205038 (M Cleminson)
<p>Distribution centres and consolidation hubs must evidence access to an adequate electrical supply and EV provision to enable a fully-electric fleet to operate from them - either through on-site provision or by proximity to existing charging facilities.</p>	202660 (C Pointon)

<p>We support micro- consolidation centres and encouraging sustainable last mile movements by cycles, EVs and other innovative solutions.</p>	<p>203612 (Cambridge City Council Liberal Democrat Group)</p>
<p>Objects to the wording of Policy I/SD, arguing it is overly focused on urban areas and lacks flexibility for rural and edge-of-settlement employment sites. The respondent references the NPPF (2024) Chapter 6, highlighting the need for planning policies to support economic growth and be flexible to accommodate unanticipated needs. The NPPF 2026 indicates that substantial weight should be given to the economic benefits of commercial development, including logistics, which may require locations outside urban centres. The respondent recommends amending Policy I/SD to support consolidation facilities at rural and edge-of-settlement locations and to allow for larger-scale facilities when justified. These amendments are suggested to enable sustainable logistics development, aligning with national policy objectives and examples like Tritax Park, Cambridge.</p> <p>Policy I/SD should be amended to explicitly support; (1) consolidation facilities at edge-of-settlement and rural locations serving nearby towns, villages and business areas; and (2) consolidation facilities that exceed “micro” scale where justified, provided they deliver equivalent outcomes in reduced vehicle mileage, lower emissions and improved delivery efficiency.</p>	<p>204575 (Tritax Big Box Developments)</p>
<p>LDL notes Policy I/SD and endorses limb 4 which requires that “Proposals for any new industrial and distribution centres that will generate significant freight traffic must provide sufficient facilities for long-term and overnight lorry parking.” The GCLP also considers the general (non-scheme specific) overnight lorry parking need being met by the expansion of the existing facilities at J24 of the A14, as</p>	<p>205167 (Lolworth Developments Limited)</p>

<p>proposed in allocation 'S/RRA/SCS Land to the south of Cambridge Services'. We consider this distinction in the two types of overnight lorry parking to be appropriate.</p>	
<p>Uses supporting local needs for "last mile" delivery should be prioritised: A typical last-mile delivery to the Greater Cambridge area is currently served from a hub in Peterborough 33 miles away. Serving these from a more local hub would reduce traffic movements when viewed as a whole.</p>	208076 (Northstowe TC)
<p>Last-mile delivery is referenced, but this should more explicitly consider solutions such as delivery lockers within new communities at the earliest planning stages. There is also an opportunity to support how people live today by retrofitting existing communities. Can planning policy actively support the provision of parcel lockers, particularly given the widespread closure of post offices? This is a significant driver of unnecessary car journeys.</p>	211005, 208005 (Cambridgeshire County Council)
<p>Letterboxes and parcel storage also require attention. Where letterboxes are inaccessible, for example, located behind gated or locked entrances, it becomes much harder for residents to receive deliveries and manage day-to-day life. Safe, secure, and accessible locations for letterboxes and parcel storage should be a priority in new developments. Anecdotally, residents often redirect deliveries to parents' homes to avoid these issues, which in turn increases travel demand and undermines trip budgets for schemes.</p>	211006 (Cambridgeshire County Council)
<p>Final-mile delivery routes must avoid the villages of Dry Drayton, Boxworth, Elsworth and Knapwell, and developers should demonstrate how they will achieve this.</p>	206383 (Boxworth Parish Meeting on behalf of A14 Logistic Forum), 211446 (Boxworth Parish Meeting)

It is recognised that it is important that development proposals include adequate provision for servicing and deliveries.	211573 (Martin Grant Land Limited)
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Policy I/SI: Safeguarding important infrastructure

Abbreviations

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

Summary of Main Issues:

Comments in support of the policy were received from: the Deference Infrastructure Organisation for the proposed safeguarding of the Bassingbourn Barracks and Barton Road Rifle Range; the University of Cambridge for the proposed safeguarding of Lord's Bridge observatory; and, in principle, from the East West Rail Company for identifying the area subject to the Secretary of State's safeguarding direction for East West Rail.

Various comments requested that the policy should do more to proactively safeguard land for prospective future transport schemes, travel hubs, active travel routes and infrastructure related to proposed site allocations. Specific comments were received from Tarmac requesting safeguarding of their rail facility at the proposed North East Cambridge site and from Anglian Water requesting safeguarding of the consented Waste Water Treatment Plant Relocation project.

Some comments expressed concern that the policy was not clear enough about the effect of the East West Rail safeguarding directions and that clearer criteria should be included to guide development. Others expressed concerns about the area covered by the safeguarding direction, including potential conflicts with other proposed developments.

General concerns were raised about the East West Rail project more generally, including its route, design and the level of consultation undertaken on the scheme.

Response to the main issues raised in representations

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

The Councils note comments received on the East West Rail project, however these are matters for its respective delivery body, East West Rail Company.

The Local Plan may safeguard specific routes and/or sites critical to developing transport infrastructure where there is robust evidence to support it. The suggestions put forward for additional schemes and projects that should be safeguarded have been considered and changes have been proposed to the policy to add safeguarding areas to several additional planned transport schemes, where it was judged there was sufficient evidence to clearly identify which land should be safeguarded. Some of the projects identified through the consultation, such as the proposed MRT scheme and new mobility hubs, are at a relatively early stage of the design and consenting process, such that it would not be possible to justify the safeguarding of a specific route or site at this stage of the process. The Councils will continue to keep this under review as the preparation of the Plan progresses. In response to the feedback received on site-specific infrastructure, strategic site allocations are accompanied by spatial frameworks which identify, indicatively, where key infrastructure connections should be located. Site allocation policies have also been reviewed and updated to be clearer where land should be safeguarded through the planning process for transport infrastructure, including active travel routes and mobility hubs.

Safeguarding of the Tarmac site at North East Cambridge and the Waste Water Treatment Works Relocation project fall outside the scope of the Local Plan. In the case of the Tarmac site, this already benefits from a safeguarding policy and consultation area in the adopted Cambridgeshire and Peterborough Minerals and Waste Plan 2021. National planning policies prevent the Local Plan from replicating policies covered elsewhere in the Development Plan. This policy, and the proposed policy for North East Cambridge

(where the site is located), have been updated to reference these existing designations more clearly. Safeguarding of the Waste Water Treatment Works Relocation project will be considered as part of the next Minerals and Waste Plan for the area.

In response to comments on the effectiveness of the policy criteria for the East West Rail, additional criteria have been proposed to make it clearer how the safeguarded area should be considered in relation to planning applications. While comments on the boundaries of the East West Rail safeguarding area are noted, the Councils are required by the Safeguarding Direction issued by the Secretary of State to consult the East West Rail Company on planning applications falling within this area and have no power to modify it.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the protection afforded by the policy for current and future military operational needs at Bassingbourn Barracks and Barton Road Rifle Range.	201163 (Defence Infrastructure Organisation)
Current and prospective future travel hub sites should be safeguarded in the plan.	203388 (G Duck)
The plan should safeguard potential future corridors capable of accommodating LRT and MRT, preventing development that may prejudice future options.	205465 (Cambridgeshire and Peterborough Combined Authority), 204527 (Cllr T Bygott)

<p>The East West Rail route has been confirmed with insufficient consultation with local residents. The route travels too close to homes and schools and the route should be adjusted, and further analysis done around the negative impacts this will have in terms of noise and disruption.</p>	<p>201585, 201587 (P Brown)</p>
<p>The plan should do more to proactively safeguard key active travel links associated with various strategic site allocations, rather than relying on such links to come forward as part of future strategies, and mandate the early delivery of walking and cycling links. For example, this includes the NIAB bridge and a tunnel under Huntingdon Road, linked to the Eddington allocation.</p>	<p>202272 (Girton PC), 205252 (J Thomas)</p>
<p>Support for the protection afforded by the policy to the Lord's Bridge observatory.</p>	<p>202525 (University of Cambridge)</p>
<p>The policy should safeguard Tarmac's operations at North East Cambridge, which is an essential rail facility used to support the sustainable transportation of construction materials. It is essential that these are included within this safeguarding policy to ensure these uses are safeguarded from any adverse impacts or conflicts of land use from future development.</p>	<p>208763 (Heatons)</p>
<p>Various concerns raised around conflicts between the proposed protection afforded by the policy for the proposed East West Rail alignment and other proposed developments, including: land to the south-west of Comberton; land at Station Road West, where two planning permissions have previously been granted; and land at North East Cambridge, which includes land where car parking is to be re-provided.</p>	<p>204555 (Bellway Strategic Land), 204191 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)</p>
<p>The policy lacks clarity on what would be regarded acceptable development within the safeguarded areas, creating uncertainty, and should not imply a presumption against all development. Clearer criteria should be included, including opportunities for design mitigation and specific circumstances where development may be supported.</p>	<p>204191 (Brookgate Land Ltd and Network Rail Infrastructure Ltd)</p>

<p>The draft Local Plan policies map includes the area safeguarded by the Safeguarding Directions, reflecting Policy I/SI. Following publication of the draft Plan and map, the Secretary of State updated the Safeguarding Directions. The policies map needs updating to show current safeguarding land. Showing the area safeguarded by the current EWR Safeguarding Directions will help those considering development in the area, as it will facilitate early engagement between developers and EWR Co.</p> <p>10.45 sets out that ‘important infrastructure’, including EWR, should be safeguarded from any adverse effects that may arise from development, the policy itself does not include any wording to require this. EWR Co requests that the relevant allocation policies included in the Plan are amended to require development to avoid conflicting with, or prejudicing the delivery of EWR.</p>	<p>209087, 211890 (East West Rail Company)</p>
<p>EWR Co notes that draft Policy I/SI safeguards Mullard Radio Astronomy Observatory (MRAO) at Lord’s Bridge, in line with the adopted Local Plans. The EWR route will pass through the Lord’s Bridge Restricted and Consultation Areas, as shown on the policies map. EWR Co is continuing to work with the University of Cambridge to assess the potential for electro-magnetic interference between the proposed railway and the MRAO.</p>	<p>211891 (East West Rail Company)</p>
<p>I believe the proposed route of East West Rail (EWR) is wrong. More consultation with locals should be carried out to establish a better alternative route that does NOT affect local rural people with noise, disruption and mental stress. The current EWR route travels too close to rural resident's houses and schools; a more respectful route should be chosen or adjusted. EWR travels just 100mtrs from CVC; terrible. I think the housing plan extends too far north and is too close to rural villages, ruining the core value of their countryside location. In particular it is too close to Knapwell.</p>	<p>201585 (P Brown)</p>

<p>Overall, I appreciate the way the public have been allowed to comment on the GCP.</p> <p>The opposite can be said about EWR. The entire plan was done behind people's backs. The proposed route has been forced upon local people who have lived in rural locations for many years but now have the face the nightmare of a noisy and disruptive railway in the back gardens. GCP needs to assess the true negative impacts of the EWR route on local people's lives and question the poor decision making of the EWR management team. Totally incompetent and untrustworthy management team.</p>	201587 (P Brown)
<p>Relocate EWR to avoid virgin farmland- use brown field sites more instead. Avoid build EWR near Barbastelle bat breeding and feeding areas. EWR needs a lot more wildlife bridges than is planned. Build more lakes for wild birds and wildlife throughout the region. Sow billions more wild flowers and of more diverse flower varieties ASAP to save insects and birds.</p>	201588 (P Brown)
<p>Active Travel and PROWs are both important infrastructure networks. These and perimeter routes should be bridleway so that provision is inclusive or horseriders.</p>	204079 (S Rogers)
<p>CWWTPR: Anglian Water considers that until such time as the opportunity to deliver the CWWTPR expires, the Local Plan should recognise the CWWTPR project. We request that the policy provides appropriate safeguarding of the consented relocation site and this is appropriately identified on the Policies Map. We would welcome the opportunity to discuss the inclusion of a safeguarding clause with the Greater Cambridge Shared Planning Service.</p>	210216 (Anglian Water Services)
<p>There is an area marked as a safe guarded area and it looking at the area we are assuming this is linked to EWR. There is a Safeguarded area and a colour we've not seen on the maps before we are assuming its land for EWR.</p>	210628 (Little Shelford PC)

<p>Safeguarding land: could the plan be more explicit about protecting land around the rail routes for future stations – re. point above about Cambridge Eastern Access, Cambridge East station, Cambourne station and even a Fulbourn station which was inc. in past transport plans etc. and with EWR and recent mayoral transport priorities it may feel like a missed opportunity to not at least have a line in policy. Can only see vague references with regards rail freight and sidings.</p>	<p>210511 (Cambridgeshire County Council)</p>
<p>ECC notes and welcomes that the emerging Plan includes this policy for safeguarding important infrastructure within Greater Cambridge. It is noted that there is reference to Airport Public Safety Zones and Airport Air Safeguarding Zones within this policy. However, the policy fails to include Air Safety Safeguarding Zones that considers the needs from cross boundary aerodromes; namely London Stansted Airport and Carver Barracks Military aerodrome within Uttlesford. ECC draws attention to the recent Uttlesford Local Plan Inspectors Report (January 2025) and the Main Modifications in particular reference MM22.</p> <p>MM22 recommends the inclusion of a new safeguarding policy that includes reference to the Duxford Aerodrome, as well as Carver Barracks and London Stansted Airport. ECC recommends that the Greater Cambridge Authorities consider this policy wording for the emerging Local Plan, and also discussions with the relevant airport operators, to ensure that the Air Safety Safeguarding Zones appropriate for Greater Cambridge are set out in future planning policy.</p>	<p>210475 (Essex County Council)</p>
<p>The policy identifies land that is subject to safeguarding directions, including EWR. Mac Mic Land are concerned with the extent of land safeguarded for EWR which is contained within the ownership boundary of Crow's Nest Farm (Site Ref. 48096). Our view is the land safeguarded and subsequently confirmed on the draft Proposals Map has not been justified by EWR and extends northwards into Site</p>	<p>207029 (Mac Mic Land)</p>

<p>Ref 48096 and so prejudices the site's development potential. It is unclear why such an extensive tract of land is safeguarded beyond the proposed route of the railway. For the avoidance of doubt, Mac Mic Group strongly supports the principle of EWR as a catalyst to realising the regions growth potential but land should be safeguarded in a proportionate and justified manner that does not sterilise the development potential of adjacent land.</p>	
<p>As the Councils are aware, the Fens Reservoir is a project of national significance for new water resources, which will provide water supply to Anglian Water and Cambridge Water customers. The reservoir will be determined under the Planning Act 2008 as a Development Consent Order. The Fens Reservoir project will continue to evolve and given its strategic nature, Anglian Water requests that the preferred route for this associated water infrastructure and the preferred location of the service reservoir at Madingley are safeguarded from inappropriate development in order that the delivery of this project of national significance is not compromised.</p> <p>We would therefore like to request that a specific safeguarding policy relating to the Fens Reservoir project as it affects South Cambridgeshire is included in the Greater Cambridge Local Plan.</p>	<p>210217 (Anglian Water Services)</p>
<p>It is critical that important infrastructure, including the East West Rail Scheme, are safeguarded from any adverse impacts that may arise from development.</p>	<p>211574 (Martin Grant Land Limited)</p>

Policy I/AD: Aviation Development

Abbreviations

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

Summary of Main Issues:

There was support for aviation development that was conscientious of noise abatement in the local area.

Comments were made about the loss of economic benefit of aviation to Cambridge with the planned closure of Cambridge Airport. The provision of flight training, high value transport, aviation engineering, maintenance and logistics will all be considerably reduced. Skilled work, local economic benefits and benefits of high value visitors should be part of an aviation forward planning approach to re-balance the provision in a sensible manner.

One respondent agreed that noise and other factors should be considered for new airports, but believed established airports like Cambridge Airport should not face restrictions due to noise from nearby developments. Another respondent requested significantly stronger noise and pollution restrictions and further research about the impact of drone deliveries. The Cambridge Green Party requested changes to the policy to have regard for the health impacts on local residents and the potential carbon emissions and wider climate impacts of proposed developments.

Concerns from Girton PC were raised about the impact aviation activity, including aircraft noise has on community wellbeing. The policy should require Noise & Flight Path Impact Assessments, public monitoring/reporting, and mitigation (route optimisation, quiet-operations, hours controls) for any aviation development or operational change. Ground-access impacts must also be managed to protect school routes and Active Travel corridors. Mothers CAN Cambridge policy considered the

policy to be weak from an environmental sustainability and climate mitigation point of view and do not support it. The policy focused on noise and amenities with no direct reference to greenhouse gas emission associated with aviation and associated infrastructure.

Further responses received included comments from the Imperial War Museum requesting that the policy recognise different types of flying activities have different noise impacts. An advanced aviation and related technologies hub at IWM Duxford would include for research and development, prototype testing and manufacture for low and zero carbon advanced air mobility technologies and supporting operations. The environmental impacts compared to conventional aircraft will be less which the policy should recognise.

Essex County Council drew attention to the published Uttlesford Inspectors Report and Main Modifications Report which include an addition of policy regarding the approach to noise exposure. It recommends the addition - “for aviation transport sources, the Significant Observed Adverse Effect Level is considered to occur where noise exposure is above 63dB LAeq,16hr (57dB LAeq,8hr at night) and the lowest observed effect level is considered to be 51DB LAEQ, 16HR (45DB LAEQ, 8HR at night)”.

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

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

The policy guides development proposals related to aviation and sets out in the circumstances where proposals would be acceptable along with any specific aviation noise impact related requirements. It has been amended to establish clearer criteria around the specific requirements aviation related proposals would need to satisfy as part of the planning application process. The policy also now refers to national noise limits set by Defra. Reference to specific metrics have been removed to ensure that updated guidance provided by Defra can be applied at the point the application is received.

More general matters relating to different sources of pollution are considered under Policy WS/HS: Pollution, health and safety which will ensure any noise and, or health concerns are addressed including any other potential environmental concerns specific to an aviation proposal are considered. Aviation safety is also considered under Policy I/SI: Safeguarding Important Infrastructure. Policies under the Local Plan's Climate Change chapter will have regard to the potential carbon emissions and, or wider climate impacts of the proposed development.

The policy has also been broadened to include aircraft noise impacts to include other non-traditional forms of aviation including Unmanned Aerial Vehicles (UAV) or Unmanned Aircraft System (UAS) – drones – given their increased use in day-to-day activities. Specific requirements for a Business Plan will allow the benefits of either economic or emergency services aviation proposals to be more clearly assessed.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Aviation activity is causing significant aircraft-noise, flight-path and community wellbeing concerns in Girton & Histon. Draft Policy I/AD should require Noise & Flight Path Impact Assessments, public monitoring/reporting, and mitigation (route optimisation, quiet-operations, hours controls) for any aviation development or operational change. Ground-access impacts must be managed to protect school routes and Active Travel corridors. Where impacts cannot be mitigated adequately, proposals should be refused to safeguard health, wellbeing, and rural character.	202277 Girton PC
With the upcoming closure of Cambridge Airport, the economic benefit of aviation to Cambridge is being considerably reduced. The provision of facility for flight training, high value transport, aviation	203050 (B Hatton)

<p>engineering and maintenance and logistics is all considerably reduced with the draft GCLP.</p> <p>An aviation forward planning approach is needed to retain skilled work, local economic benefits and benefits of high value visitors. A key example of this is the plans to relocate the air ambulance station, a critical provision that needs immediate replacement and approval.</p>	
<p>The draft GCLP is anti-aviation and suggests it lacks consultation with the local aviation community. While noise and other factors should be considered for new airports, however established airports like Cambridge should not face restrictions due to noise from nearby developments.</p>	203136 (G Buxton)
<p>Fowlmere airfield is already very conscientious of noise abatement in the local area. Support for aviation development anywhere in the country especially in Fowlmere.</p>	203552 (R Ince)
<p>Aviation proposals should explicitly consider both public health and climate impacts, aligning the policy with sustainability and community wellbeing objectives.</p>	(203759) Cambridge Green Party
<p>Impose significantly stronger noise and pollution restrictions if possible. Also explore the impact of drone deliveries- commission a research paper if necessary.</p>	(203822) A Carpen
<p>Draft Policy I/AD focuses on noise and amenities and does not directly reference greenhouse gas emission associated with aviation and associated infrastructure. The policy should explicitly consider greenhouse gas emissions, include conditions based on climate impact of any developments, distinguish between different purposes of aviation, and specify any development will align with national aviation decarbonisation pathways.</p>	204925 (Mothers CAN Cambridge)
<p>ECC draws attention to the Uttlesford Inspectors Report and Main Modifications that is published. The inspectors and main modifications include an addition of policy regarding the approach to noise exposure. It recommends the addition - "for aviation transport sources, the Significant Observed</p>	210476 (Essex County Council)

<p>Adverse Effect Level is considered to occur where noise exposure is above 63dB LAeq,16hr (57dB LAeq,8hr at night) and the lowest observed effect level is considered to be 51DB LAEQ, 16HR (45DB LAEQ, 8HR at night)". This wording may be appropriate for the Plan.</p> <p>Furthermore, it is also important to note that the Inspectors for Uttlesford also welcomed the addition of reference to outdoor noise on school sites should not exceeding 55DB LAEQ (30 MIN) (reference from the Main Modification - MM32). Similarly to the above, Greater Cambridge authorities may seek to adopt a similar approach.</p>	
<p>Point 4 of the policy recognises there are different types of flying activities which have different noise impacts and provides examples. IWM in partnership with Gonville and Caius College and Henry Boot Development (HBD) is bringing forward proposals, led by HBD for an advanced aviation and related technologies hub at IWM Duxford. This would include for research and development, prototype testing and manufacture for low and zero carbon advanced air mobility technologies and supporting operations. The environmental impacts compared to conventional aircraft will be less. This being the case it should be recognised in the policy and supporting text. It is suggested this be amended to read as set out in the full representation.</p>	208281 (Imperial War Museum)
<p>Though this Policy lists the factors to consider for development of airfields, land contamination has not been included. We would recommend revisions to highlight the need to consider contamination which may have resulted from the operation of the airfields, with particular reference to PFAS as a major potential risk to the groundwater environment. Contaminated Land Assessments should be completed as per guidance in the NPPF, Environment Act 1990 and other recent or superseded guidance.</p>	211185 (Environment Agency)

Policy I/EI: Energy infrastructure masterplanning

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy and the need to support energy infrastructure and renewable energy generation in a joined up way. Comments were made in relation to further clarity on district heat networks, and how the impacts of cross boundary development was considered in terms of energy. Concerns were raised by some developers around the feasibility and need to provide a separate document for energy master planning and the potential impact on deliverability. Further responses referred to the need to incorporate micro-grids, village energy generation and micro-grids. Comments were made by the EA about the potential for pollution of the water environment due to abnormal and emergency situations at BESS developments, in particular fires.

Response to the main issues raised in representations

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

Energy consumption from large scale neighbouring authorities will be picked up by UKPN and wider Local Area Energy Planning to ensure that there is sufficient capacity in the grid to accommodate development in the pipeline. The impact of some strategic scale projects in neighbouring areas is also being considered as part of the National Energy System Operators (NESO) Regional Energy Strategic Plan (RESP).

The Kingsway Solar Farm proposal is a nationally significant infrastructure project. As such, the Councils' are a consultee only

on these applications and the decision is made by the Secretary of State.

Policy CC/RE: Renewable energy projects and infrastructure in the Climate Chapter supports the development of a district heating system in Cambridge city centre and community-led low-carbon heating infrastructure. The policy plans positively for this, but there are some limitations to the role of planning policy and there are wider Council strategies to support this.

The Local Plan is supportive of district heat networks in appropriate locations – i.e. where there is need, low and zero carbon networks, connects to existing development and plays a key role in retrofitting of development. The National District Heat Zoning Legislation will set out how development can connect to district heat networks and there is further secondary legislation in the pipeline to be published which will further inform our approach at a local level.

The Cambridgeshire Local Area Energy Plan has identified the need for significant upgrades of existing and new grid infrastructure to support both growth and wider decarbonisation. Further work to help support the Greater Cambridge Local Plan has also helped to refine this information and has been shared with UKPN to inform their ED3 plans.

Site based Energy Infrastructure master planning is necessary to achieve a more joined up approach to infrastructure provision, support the transition to a net zero carbon society and open up the potential for some infrastructure to be forward funded to help speed up the delivery of key development sites. This includes heat networks. Some additional detail as to the content on the energy masterplans has been added to the policy, while further detailed guidance on energy infrastructure plans requirements and district heat heating will be provided in technical notes and the sustainability checklist. The assessment of the most suitable heat source is very site, context and scale and type of proposed development specific. Hence the need to weigh this up with other factors, and its inclusion in the climate chapter.

Once the secondary legislation for District Heat Network zoning comes into force this will not be controlled as part of the

planning process as it is currently and zone co-ordinators will facilitate district heat network connections. There is a risk that putting further detail in the Local Plan will conflict with this emerging guidance, but the principle of District Heat Network use in the appropriate location with low and zero carbon heat sources is supported.

Energy flexibility is an important part of managing energy infrastructure. This has been included in the policy and will be supported by technical guidance to ensure this is appropriate for development type and scale.

Cambridgeshire County Council has a community energy fund which could support and enable village-scale renewable energy. This policy does not prohibit these types of projects going forward. There are wider energy projects funded by the Councils and third parties which will bring renewable energy generation to rural and urban areas.

The need for a specific energy masterplan (separate to a sustainability statement) reflects the intention to apply energy masterplanning requirements to a higher threshold of development. Furthermore, there are specific technical requirements that this document will need to respond to. A separate masterplan will enable this information to be shared with and reviewed by third parties and consultees such as UKPN and NESO more easily, facilitating a more joined up approach for future energy masterplanning and the business planning of the distribution systems operators like UKPN; thus ensuring there is enough capacity in the grid for the future pipeline of development.

The threshold for 250 units is set at a level of development that would require significant pre-planning due to its impact on the grid. The allocated sites in the Local Plan have already been built into the LAEP and assumptions have been made on the energy demand to feed into this planning. This has also been shared with UPRN for ED3 modelling. Early engagement with network providers is encouraged to ensure suitable provision for energy needs in projections.

The Councils' note the comment from the Environment Agency and will reflect this in a future technical note to support energy

infrastructure. It is deemed that this is too detailed for inclusion in the policy wording.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Concerns about the impact of Kingsway Solar Farm.	202032 (Weston Colville PC)
The importance of ongoing and meaningful engagement with key stakeholders in this process to ensure they are willing to support facilities coming forward through new development.	210273 (Vistry Group)
Policy is a positive step forward in supporting energy infrastructure but could be more ambitious in promoting renewable energy generation. Safeguarding land could include sites for small-scale solar, wind or biomass not just grid connections with additional criteria for the policy suggested.	203760, 203761 (Cambridge Green Party)
The policy could support experimental or more efficient policies to integrate sustainable energy generation and reduce reliance on grid reinforcement.	203760, 203761 (Cambridge Green Party)
Plan should require developers to demonstrate how energy infrastructure will be future-proofed including capacity for renewable energy generation, storage and smart grid integration	205051 (M Cleminson)
Contributions should also be referenced in relation to the impact on energy consumption impact within the Greater Cambridge area from large scale neighbouring authority large infrastructure projects (National Infrastructure Projects) at Tempsford/EastWest rail station (30,000 houses and interchange EW rail station).	201394 (Gamlingay PC)

<p>In terms of infrastructure, notably heat networks and the planning of heating, cooling and sources of renewable electricity in clusters and communities that reduce the demand on external connections. In the short term, district heating can provide a highly efficient, low carbon solution. Heat networks should be used for futureproofing to provide district heating and cooling capability. Heat networks can be adapted from the urban environments to rural situations where different energy sources can be applied.</p>	202155 (R Stobart)
<p>Energy planning should support local renewables, micro-grids, and community energy connected to key sites (e.g., Pavilion, youth spaces). Renewable energy supports community wellbeing and resilience. Infrastructure must fit rural character. Localised energy reduces network stress.</p>	202273 (Girton PC)
<p>While not within the immediate scope of the Local Plan, there are concerns about how energy demand will be met to support the Plan alongside other growth strategies. The complexity of managing energy highlights the importance of a strategic, master-planned approach. We encourage engagement (convened through Cambridge Growth Company) with regulators, national government and local authorities to support early investment in local energy infrastructure and the development of an integrated energy masterplan aligned with planning and growth strategies across the region.</p>	203542 (Cambridge Ahead)
<p>Solar farms provide ideal opportunity for creating permissive bridleway provision.</p>	204080 (S Rogers)
<p>Support for policy. The policy appropriately recognises the need for new development to be underpinned by resilient, future-proofed and low-carbon energy infrastructure, consistent with national and local climate objectives and emerging energy system requirements. Tritax places sustainability and energy efficiency at the heart of its projects, with new buildings designed to achieve net zero carbon in construction, alongside EPC A ratings and BREEAM Excellent as a minimum target.</p>	204582 (Tritax Big Box Developments)

<p>The respondent questions the appropriateness of requiring an Energy Masterplan for all schemes exceeding 250 dwellings, citing unclear rationale for the threshold. Requirement should be proportionate to scale of development for energy masterplans, and there should be clear guidance around discussion with National Grid. Policy is critiqued for not considering that new substations may be more effectively located elsewhere, and clarity is requested regarding which substations may require upgrades. Considerations of timescales is integral to development of policy.</p>	<p>204629 (Redrow South Midlands)</p>
<p>The Environmental Agency note the mention of battery energy storage sites and recommend that additional wording be added to the policy to set out that there is potential for pollution of the water environment due to abnormal and emergency situations at BESS developments, in particular fires.</p>	<p>211175 (Environment Agency)</p>
<p>It is recognised that it is important that large scale developments masterplan for energy infrastructure to help facilitate decarbonisation and make best use of grid infrastructure.</p>	<p>211575 (Martin Grant Land Limited)</p>

Policy I/ID: Infrastructure and delivery

Abbreviations

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

Summary of Main Issues:

There was broad support for the Policy subject to making suggested amendments.

A number of representations from local residents, parish councils, amenity groups and local organisations sought reference to be made in the Policy to the requirement to secure specific forms of infrastructure provision, including flood mitigation, blue light services, natural greenspaces, integrated public transport, cultural, digital, and healthcare infrastructure; or ensure infrastructure is delivered to a particular standard, for example ensuring roads are constructed to adoptable standards. Some neighbouring authorities sought reference to the provision of cross-boundary infrastructure and the need to effectively mitigate potential impacts on services and facilities as a result of development on or near their administrative boundary.

There was strong support for the requirement for infrastructure to be delivered in tandem with the build out of the development, with a number of respondents suggesting this should be strengthened.

Several respondents raised concerns with the Infrastructure Delivery Plan (IDP). This included omissions around forms of infrastructure, such as adult social care and youth services, the use of inadequate standards, uncertainty around water supply and strategic transport, and a lack of detail on the cost of certain infrastructure and how they will be funded. Views were also shared about the need to address existing deficiencies, specifically for water, waste water, and healthcare, before planning for more homes and jobs. A concern was also raised about the Viability Assessment and the absence of a specified S106 cost.

A number of developers raised concern around the requirement to prepare and submit a Utilities Statement, which they considered was onerous and could lead to additional costs and delays. They sought amendments to the policy to ensure current capacity constraints or objections from utility providers would not prevent development from coming forward if reasonable mitigation or phased development delivery was possible. Other issues raised included the definition of 'adequate capacity' and its alignment with provider obligations; that planning obligation assessments should consider the latest information set out in Council's Infrastructure Funding Statements; and that the Policy should not reference Community Infrastructure Levy (CIL), which they considered was premature as a CIL for the Greater Cambridge area has not yet been adopted.

Response to the main issues raised in representations

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

There are detailed policies in the Local Plan that address the various forms of infrastructure that need to be considered depending on the nature, scale and location of a proposal. These policies establish how the need is to be assessed, the standards to be applied, as well as the preferred approach to provision. It is therefore not necessary or appropriate to try to list in this one policy all forms of infrastructure that may be sought from development or particular standards that should be met, when the plan is intended to be read as a whole.

The wording of the policy has been amended to further strengthen the requirement for infrastructure to be provided in a timely manner to support occupation of the development, including where development is to be phased and built out over a longer period of time.

The updated IDP will, where information exists, seek to address the shortcomings identified by respondents. However, much of the certainty sought is reliant on whether the relevant service provider has detailed proposals for provision. Where such detail is

currently unavailable, broad estimates will need to be used, and the IDP further updated and refined as each of the infrastructure projects are worked up in more detail. A revised IDP has been published to support this Proposed Submission Local Plan, and the Councils' intend to prepare a further update prior to submission of the Plan for examination.

The Viability Assessment is based upon a residual land value model and shows the funds available accounting for all development costs and required profit that can be put towards planning obligations (S106 & CIL). The Viability Assessment will be updated and will include a S106 cost derived from the IDP.

Amendments have been made to clarify that Utilities Statements should set out the mitigation to address current capacity constraints, including appropriate phasing of development; but with the express need to demonstrate that, if additional capacity is required, this is capable of being secured at the appropriate time to support the build-out and occupation of development.

Periodically updating the IDP and annual reporting on infrastructure delivery through the Infrastructure Funding Statement are the means by which the Councils will monitor infrastructure provision to support planned growth. However, it is not considered necessary for this to be referenced in the policy itself.

CIL currently forms part of the planning obligations regime in England, alongside Section 106 Agreements. All Councils can introduce a CIL for their area. The Councils have signalled a clear intention to bring into effect a CIL for Greater Cambridge and it is therefore right and appropriate for the policy on infrastructure and delivery to reference this.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>These contributions should also be referenced in relation to the impact on energy consumption impact within the Greater Cambridge area from large scale neighbouring authority large infrastructure projects (National Infrastructure Projects) at Tempsford/EastWest rail station (30,000 houses and interchange EW rail station)</p>	<p>201393 (Gamlingay PC)</p>
<p>Concern around the risk of flooding and that the plan is based on the latest flood risk data, reflecting current capacity issues, surface water flood risk, historic patterns of flooding and cumulative data on impact of proposed developments. The plan must contain solid measures to prevent risk of flooding, including front-loaded mitigation, with S106 contributions negotiated for on-site and off-site mitigation to address local flood risk concerns and improve existing infrastructure.</p>	<p>201464 (M Lucchetta-Redmond), 201980 (Swavesey PC), 202274 (Girton PC)</p>
<p>The requirement for necessary infrastructure aligns with NPPF paragraph 35, but may overlap with s106 and emerging Infrastructure Tariffs, potentially leading to duplication. Questions arise regarding the definition of 'adequate capacity' and its alignment with provider obligations due to the broad definition of 'infrastructure' in the policy.</p> <p>The policy should clarify that planning obligations assessments will consider the latest information from the Council's Infrastructure Funding Statement to avoid double payments for infrastructure.</p> <p>Concerns exist that requiring a full Utilities Statement for all major developments could lead to additional costs and delays; reliance on DNO and provider scoping statements should be allowed.</p>	<p>204743 (Redrow South Midlands)</p>

<p>The policy on viability is generally supported, but clear parameters for independent review costs and timings should be established to promote transparency.</p>	
<p>New infrastructure needs to be delivered in timely manner, reflecting needs and speed of build out, reflecting previous experience (e.g. Northstowe and existing Cambourne) and the known problems in health and social care and education.</p>	201903 (C Deer)
<p>The Infrastructure Delivery Plan (IDP) lacks finalised costings, funding streams, and delivery bodies for many priority schemes, making the plan unjustified. In some cases, it lacks infrastructure solutions by deferring identification of specific measures (e.g. for energy supply).</p>	202033 (Haslingfield PC)
<p>There is uncertainty around water supply and transport, which may undermine the effectiveness of the plan. The plan relies on critical water infrastructure not expected to be available until 2032-2037, and a transport strategy that is not due for completion until end 2026.</p>	202033 (Haslingfield PC)
<p>There are identified bottlenecks in waste transfer capacity and a lack of confirmed primary care spaces, indicating ineffective joint working amongst stakeholders.</p>	202033 (Haslingfield PC)
<p>Support for cultural infrastructure to be recognised as core civic infrastructure, cultural venues to be integrated into infrastructure planning, phasing and investment pathways and a partnership-owned Cultural Infrastructure Pipeline is established for new provision and renewal, the plan to recognise that significant investment is required, coordinated public/private/philanthropic investment is enabled, potential for community asset transfer is strengthened with governance support and capital access, and Create Cambridge is engaged as an advisor on cultural infrastructure strategy development.</p>	202059 (H Chamberlain), 202144 202312, 202326, 202757, 202881, 202884, 204176, 205411 (Cambridge Junction / Create Cambridge), 202904 (Cambridge Junction R Tinkler) 202202 (H Tam),

202390 (J Webber), 202415
(T Shaw), 202463 (K Jones),
202688 (T Altmann), 202718
(W Townsend), 202786 (S
Lee), 202936 (R Tarry),
202970 (T Flinders), 203351
(N Ellis), 203442 (S
Ashworth), 203483 (L Heap),
203544 (D Lever), 203633 (Z
Svendsen), 203853 (N Yeni),
203874 (J Fritsch), 204408
(New International
Encounter), 204691
(NEUBAU Architecture Ltd),
204706 (A Giarlis), 204843
(L Matthews), 205021
(Wysing Arts Centre),
205055 (L Sheerman,
Impact facilitator, University
of Cambridge), 205101 (H
Paterson), 205208 (J

	Walsh), 205315 (A C de Azevedo Lamha), 205346 (N Oakley), 205348 (L Howse), 205409 (A Seiglow)
Part 2 of the policy does not specify the phasing of infrastructure compared with development and should be reworded to require necessary infrastructure provision to be put in place before the corresponding development. It could also be clarified that conditions may be implemented to ensure that construction can only commence when necessary infrastructure is established.	202576 (P Tribble), 203614 (Cambridge City Council Liberal Democrat Group)
Welcomes recognition in supporting text of the need for parks, open spaces and land for biodiversity, but would be better framed as providing strategic and local green infrastructure, in support of the biodiversity and green infrastructure policies elsewhere in the plan. The supporting text should also include reference to natural greenspaces.	202943 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 204390 (Cambridge Past, Present and Future)
Concern that the IDP: <ul style="list-style-type: none"> - Uses inadequate Fields in Trust standards to assess green infrastructure provision and does not reflect quantity of strategic green infrastructure needed to address historic deficiencies - Fails to acknowledge land availability in the right places as constraint to green infrastructure delivery 	202943, 202949, 202952, 202953 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 204390 (Cambridge Past, Present and Future)

<ul style="list-style-type: none"> - Is inconsistent with the Planning Obligations SPD and other evidence base documents around average prices for agricultural land or costings for specific habitat creation measures, including natural greenspaces 	
<p>Developers should be required to construct roads to adoptable standards, as previously agreed at joint Cabinet.</p>	<p>203614 (Cambridge City Council Liberal Democrat Group)</p>
<p>Policy lacks definition of key terms, including “acceptable in planning terms,” “appropriate physical and social infrastructure” and “adequate capacity”, making it unclear what developers are responsible for. It would benefit from clear references to supporting documents, including what coordination and phasing are required, which types of infrastructure are included, and how capacity should be assessed on- and off-site, to increase certainty and ensure delivery of sustainable, healthy communities.</p>	<p>203763 (Cambridge Green Party), 204753 (Redrow South Midlands)</p>
<p>Funding should be allocated to infrastructure projects in villages that come under pressure due to the expansion of Cambridge. For example, small standalone water treatment works or GP surgeries. This would also support the future expansion of these villages.</p>	<p>203832 (R Gould)</p>
<p>Active Travel routes and PROWs should be bridleway to include horseriders.</p>	<p>204081 (S Rogers)</p>
<p>The policy prematurely references a CIL which has not yet been adopted for Greater Cambridge, and should only refer to planning obligations or contributions via S106.</p>	<p>204132 (E W Petter Ltd), 204202 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204298,</p>

	204563 (Bellway Strategic Land), 204778 (Vistry)
Argues that utility company objections should not unreasonably delay or prevent planning applications, which should not be solely refused on the basis of capacity constraints if feasible mitigation or phased delivery is possible.	204132 (E W Petter Ltd), 204202 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204298, 204563 (Bellway Strategic Land), 204778 (Vistry)
The policy is too rigid, requiring developers to secure all necessary infrastructure despite this not all being within their control. This may require place unmanageable obligations on them that cannot be fulfilled and is not consistent with national planning policies.	204250 (Railpen), 204489 (Cambridge Investment Partnership)
The policy should clarify that planning obligations assessments will consider the latest information from the Council's Infrastructure Funding Statement to avoid double payments for infrastructure.	204753 (Redrow South Midlands)
Concerns exist that requiring a full Utilities Statement for all major developments could lead to additional costs and delays; reliance on DNO and provider scoping statements should be allowed.	204753 (Redrow South Midlands)
The policy on viability is generally supported, but clear parameters for independent review costs and timings should be established to promote transparency.	204753 (Redrow South Midlands)
Concern that part 3 of the policy, as drafted, places sole liability on developers for addressing historical infrastructure deficiencies. Requirements should be focused on the direct impact of the proposed development.	204909 (Hill)

<p>The policy should clearly identify health infrastructure as essential in the Local Plan, requiring development to fund healthcare infrastructure necessitated by new housing. Developer contributions must be consistently leveraged to address the demand for health and care services, including cumulative impact of smaller housing growth. The plan should include a section outlining the process for determining developer contributions for health infrastructure, ensuring alignment with NHS requirements, with flexibility for providers to request financial contributions or new purpose-built facilities.</p>	<p>205166 (NHS Cambridgeshire and Peterborough ICB)</p>
<p>Historically little thought has been given to the public realm as a cohesive experience. Piecemeal proposals for small shops or playgrounds do not, on their own, support community. Provision of a wide range of service, easily maintained public space and facilities for meeting and entertainment are critical, allowing people to meet and fostering shared belonging.</p>	<p>205415 (D Stoughton)</p>
<p>Fire, Resue, Police and Ambulance services should be referenced in the policy and supporting text</p>	<p>207488 (Cambridgeshire Constabulary), 207518 (Cambridge Fire and Rescue Service)</p>
<p>Agree that 'new development must be co-ordinated and phased in tandem with the provision of appropriate physical and social infrastructure', and, in the case of accessible greenspace provision, this is particularly important where housing is located close to sensitive sites at risk of recreational pressure (e.g. SSSIs).</p>	<p>207640 (Natural England)</p>
<p>Major deficiencies in hospital infrastructure should be addressed before further jobs and homes are allowed.</p>	<p>208741 (Trumpington Residents' Association)</p>

<p>The IDP should address missing forms of essential infrastructure, including children and adult care social services and youth services, which are essential to the wellbeing and social inclusion aspirations of the plan.</p>	<p>208741 (Trumpington Residents' Association)</p>
<p>There needs to be an explicit plan for funding the Fens Reservoir and water recycling effluent re-use schemes, as referenced in the IDP. Concern about the nature of the River Cam abstraction scheme and the extent to which it can leverage opportunities.</p>	<p>208741 (Trumpington Residents' Association)</p>
<p>Should be clearer that integrated mass rapid transport is needed to support sustainable development and that it should be designed and delivered as an urgent regional priority, serving an area beyond Greater Cambridge (recognising the functional travel to work area). The plan should reflect that a high quality public transport network is essential for driving modal shift and overcoming congestion and depressed productivity. To be successful, the network must be attractive, frequent, reliable, fast, affordable, spatially and multi-modally integrated and practically accessible. It should consider how it could be spatially integrated into the city, examining the likely need for a tunnel which could only attract financing through metro or light rail as opposed to buses. This should be embedded into the plan's vision.</p>	<p>208754, 208756, 208758 (Cambridge Connect)</p>
<p>The Local Plan should state unequivocally that an integrated mass rapid transit network is needed to support sustainable development within the region. This mass rapid transit network needs to be designed and delivered as an urgent regional priority to address pressures of growth and meet economic, social and environmental goals.</p> <p>The Local Plan should acknowledge that its radius (for local government administrative reasons) is too small to cover the functional travel to work area, and as such is an inadequate basis for a regional mass</p>	<p>208742 (Trumpington Residents Association)</p>

<p>rapid transit system. The development of Greater Cambridge over the next 10-30 years will inevitably require quick, cheap, reliable, safe public transport connections to surrounding towns, not least Huntingdon, St Ives, St Neots / Tempsford, Ely, Newmarket, Haverhill, and indeed Peterborough. Imminent reorganisation of local government should go some way to meeting this weakness in the draft Local Plan, although the current planning authorities could anticipate and seek to address the deficiency.</p>	
<p>The Strategic Priority to "Plan for transport, water, energy and digital networks; and health, education and cultural facilities; in the right places and built at the right times to serve our existing and growing communities" is an aspiration, not a strategy, and requires clearer definition. However, the plan should be more imaginative around financing options be specific about the spatial plan (i.e. clusters and corridors of growth) and how they will be facilitated and supported in a practical and sustainable way by the transport network.</p>	208755 (Cambridge Connect)
<p>The plan should incorporate a strategic transport assessment to consider the cross-boundary impacts of the proposed Cambridge East and Grange Farm allocations on the highways network, including requirements for mitigation on the A1307 at Haverhill, reflecting commuting patterns.</p>	204890 (West Suffolk Council)
<p>The impact of proposed growth at Grange Farm on the capacity of education and health facilities must be evaluated to ensure timely development and avoid pressures on Haverhill's services, reflecting timing and phasing of development. Additional detail should be set out around how effective mitigation would be delivered.</p>	204890 (West Suffolk Council)
<p>I support Create Cambridge in asking that:</p> <ul style="list-style-type: none"> • further development of the local plan refers to the Create Cambridge Insights Report as evidence base 	204180 (Cambridge Junction / Create Cambridge)

<p>with regards to the development of Cambridge's digital cultural infrastructure</p> <ul style="list-style-type: none"> • digital cultural infrastructure is recognised within infrastructure expectations/GCCIS • commitment to common metrics, aggregated data and measurement tools • digital capability is included within the definition of cultural infrastructure • the Cultural Infrastructure Pipeline incorporates shared platforms, interoperable systems, aggregated data tools and organisational digital capacity • low digital maturity is addressed, including that only 9.2% of venues currently use connected booking systems 	
<p>In terms of infrastructure delivery to support growth across our region, it is important that we take account of the longer-term ambitions for growth that will be brought forward by the Cambridge Growth Company, in addition to that being proposed in the Greater Cambridge Local Plan (GCLP) when assessing current and future infrastructure needs</p>	<p>209155 (Anglian Water Services)</p>
<p>Anglian Water supports the policy requirements to ensure that infrastructure capacity is available or can be made available in time to serve the development, including the submission of a phasing strategy to align with the timing of additional infrastructure investment. We agree that a Utilities Statement should support this to provide details including foul and surface water drainage and details of any engagement and agreements made. We encourage developers to undertake early engagement with Anglian Water including the submission of pre-planning enquiries to establish sustainable points of connection to our combined, surface water, and foul drainage networks, and capacity at our WRCs. We provide detailed information on our website on how developers can apply for these assessments based on those which best suits the development. Noting the requirements for developers, in submitting accompanying</p>	<p>210218 (Anglian Water Services)</p>

<p>statements to support development proposals, it should be clear that separate surface water drainage strategies may be prepared and the Sustainability Statement would also lead to submissions regarding potable water supply and water efficiency. The local plan could help to clarify how these additional statements should be incorporated and prepared, as they may in some circumstances become signposts to other documents on larger schemes, or for smaller/minor developments, become part of the Planning Statement.</p>	
<p>We are pleased to see that reference to Foul and surface water drainage has been included in this policy, together with the requirement to demonstrate adequate capacity exists.</p>	<p>211176 (Environment Agency)</p>
<p>Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.</p>	<p>210371 (Community Campaigner D Barton)</p>
<p>The council should consider developing dementia ready housing as part of its IDP. West Yorkshire Combined Authority has created a guidance document on dementia ready housing: Dementia-ready housing</p>	<p>210335 (East of England Ambulance Service NHS Trust)</p>
<p>HEMS support EEAST in delivering high level critical care and transportation to specialist hospitals for patients that have severe or life-threatening injuries and medical conditions. To accommodate the different airframes that operate in this region, an equivalent size of a football field would be required to support both day and night landings. This space needs to be free of overhead and ground level obstacles eg trees and overhead cables and ideally be centrally located within the development with easy road access to and from. It would be preferable if ground lighting was available for the helicopter</p>	<p>210337 (East of England Ambulance Service NHS Trust)</p>

<p>to land, but is not essential. As a minimum helicopter landing could easily be included in developers existing plans for open, leisure or sport space. Ambulances and critical care vehicles are often used to transport patients to the helicopter landing site.</p>	
<p>A small number of pupils, living in Greater Cambridge, attend schools in Suffolk (and, indeed, vice versa). Any development proposal near the border with Suffolk should include consideration as to whether or not any resulting demand for school places will result in demand being placed upon Suffolk schools. In rare circumstances, developer contributions may be required. Please see the Section 106 Developer's Guide to Infrastructure Contributions in Suffolk for further information on the County Council's approach to seeking education and other infrastructure contributions.</p>	<p>210631 (Transport 2000 Cambs & W Suffolk)</p>
<p>Much like education, a small number of residents, living in Greater Cambridge, will use Suffolk County Council's infrastructure including Haverhill's Recycling Centre which opened in August 2024. Any development proposal near the border with Suffolk will need to include consideration as to whether or not any resulting demand will result in demand being placed upon Suffolk's infrastructure. In some circumstances, developer contributions may be required. Please see the Section 106 Developer's Guide to Infrastructure Contributions in Suffolk for further information on the county council's approach to seeking waste and other infrastructure contributions.</p>	<p>210638 (Transport 2000 Cambs & W Suffolk)</p>
<p>The Local Plan must include strong policies to support the introduction of the following (which should also be detailed in the Infrastructure Delivery Plan): - Measures to enable buses to travel through Cambridge freely, e.g. more bus gates; traffic filters, a circulation plan, road charging.; Schemes to raise funds to invest in public transport e.g. Workplace Parking Levy; road charging; These policies will</p>	<p>203235 (Cambridge Area Bus Users)</p>

<p>enable the delivery of an expanded bus network and the provision of the attractive, reliable services our communities require to make bus travel a genuine choice for all.</p>	
<p>With the exception of major bus infrastructure schemes already in development (C2C, CSET), details of the additional public transport measures to connect sites to Cambridge are vague. These additional public transport measures will largely determine whether bus travel is a genuine choice for residents. A detailed IDP should be established, including both infrastructure and services. As already noted, measures to enable buses to travel through Cambridge freely (e.g. more bus gates, traffic filters, a circulation plan, road charging) and schemes to raise funds to invest in public transport (e.g. Workplace Parking Levy, road charging) are also crucial and should be included as strategic transport measures.</p>	203240 (Cambridge Area Bus Users)
<p>The policy I/ID is deemed overly rigid, requiring developers to secure all necessary infrastructure, which may not be within their control. The respondent highlights that strategic and utility infrastructure is often delivered by statutory undertakers under separate frameworks. The National Planning Policy Framework states that policies should be deliverable and reflect reasonable expectations of developers. Requiring developers to demonstrate arrangements for infrastructure risks placing unmanageable obligations on them. The policy wording may exceed statutory tests for planning obligations, potentially delaying development and conflicting with national objectives.</p> <p>Changes to plan: The policy should therefore be amended to acknowledge that the delivery of certain infrastructure will be dependent on, and led by, third-party infrastructure providers. Without this clarification, the policy risks being ineffective, undeliverable and inconsistent and therefore fails NPPF tests of soundness by lacking effectiveness, deliverability, and alignment with national policy</p>	204250 (Railpen)

<p>The respondent objects to policy I/ID as it references Community Infrastructure Levy (CIL) which has not been adopted in the Greater Cambridge Area, suggesting the policy should only refer to planning obligations via S106 agreements.</p> <p>While supporting the objective of sufficient infrastructure capacity for new development, the respondent believes that objections from utility providers should not unreasonably delay or prevent development. The respondent recommends that the policy clarifies that development should not be halted due to current capacity constraints if reasonable mitigation or phased delivery is possible.</p> <p>It is requested that the policy be revised to ensure that objections from water companies do not automatically prevent development and that appropriate conditions or obligations should allow for capacity issues to be addressed.</p> <p>It is requested that the policy and/or supporting text be revised to make clear that objections from water companies cannot automatically prevent development, and that development should proceed where reasonable mitigation or planning mechanisms can address infrastructure requirements.</p>	<p>204298 (Bellway Strategic Land)</p>
<p>Large numbers of new dwellings should not be built until the infrastructure for providing water (and for disposing of waste water) is in place. Developers should contribute to the cost of establishing this water infrastructure.</p>	<p>203290 (J Palmer)</p>
<p>National Highways have reviewed the Draft Infrastructure Topic Paper, published as part of this consultation. It is understood that this document will feed into the work currently being prepared by the Cambridgeshire and Peterborough Combined Authority (CPCA), and the preparation of the Local Transport and Connectivity Plan (LTCP). National Highways will continue to work with the LPA and the</p>	<p>210849 (National Highways)</p>

CPCA to ensure the appropriate level of mitigation is secured as part of the Local Plan to accommodate the proposed allocations and the growth across the district.	
The policy refers to the submission of a Utilities Statement. It is considered that such requirements are more appropriately addressed through the Council's validation requirements rather than through policy wording.	210274 (Vistry Group)
Page 73 of the IDP- amend the sentence to the following: School sizes vary considerably across Greater Cambridge. In the city, provision ranges from small one-form entry schools (such as St Paul's CE Primary and the Spinney Primary) to larger three-form entry schools (such as St Matthew's and Trumpington Park).	210530 (Cambridgeshire County Council)
We do not believe that the draft IDP makes adequate provision for the secondary and tertiary healthcare needs of the existing, let alone the growing, population.	210890 (Great Shelford PC)
We are broadly supportive of the policy.	210961 (Great Shelford PC)
Concerns regarding the Regulation 18 viability study - The modelling does not include any allowance for Section 106 obligations or other infrastructure contributions (e.g. CIL). By excluding s.106 and CIL costs from its modelling, the current viability evidence does not demonstrate that the proposed affordable housing requirements are viable once realistic development contributions are taken into account. Nor does it show the impact of those requirements on the funding available for essential infrastructure. The viability study should be revisited to include realistic assumptions for Section 106 and infrastructure costs, so that the balance between affordable housing provision and infrastructure delivery can be properly tested.	211071 (Cllr R Williams)

<p>We are pleased to see that the IDP references the WCS evidence document and includes the need for investment at WWTWs to accommodate the growth outlined in the Local Plan. Future needs are also referenced, along with the current engagement Anglian Water is undertaking with key external stakeholders to find solutions to capacity challenges, including around solutions for Cambridge WWTW following the withdrawal of funding for the relocation project. We note the IDP may be updated with further information on priority investments once the next version of the DWMP is published and capacity solutions have been identified. We encourage an update to the document to ensure the evidence base remains sufficient over the lifetime of the plan.</p>	<p>211187 (Environment Agency)</p>
<p>CPPF strongly supports the use of CiL to enable the delivery of green and blue infrastructure policies.</p> <p>CPPF welcomes the recognition of the need for parks, open spaces, and biodiversity land, suggesting the explicit inclusion of 'strategic green infrastructure' or 'natural greenspaces' in the text.</p> <p>CPPF notes ongoing work on Green Infrastructure and Public Open Spaces, emphasising that changes in standards must be reflected in the IDP.</p> <p>CPPF highlights inconsistencies in costs for strategic green infrastructure across various documents, expressing concern that some costs are underestimated, particularly for agricultural land.</p> <p>CPPF stresses the need for consistency in GI and Infrastructure policies to ensure adequate financial contributions from new developments for strategic natural greenspace.</p>	<p>204360 (Cambridge Past, Present and Future)</p>

<p>CPPF shares concerns regarding the appropriateness of the Fields in Trust standards used in the IDP, advocating for a bespoke standard.</p> <p>CPPF strongly supports the initiatives listed in IDP Table 17.2, asserting that sufficient financial contributions from new developments are essential for their delivery.</p>	
<p>Section 6.b - is incompatible with Policy CC/NZ which prohibits the use of gas for new development. Should 6.b be present?</p>	205579 (P Tribble)
<p>See attached IDP Addendum Evidence to assist with the update of both the Greater Cambridge Local Plan IDP and the North East Cambridge Area Action Plan IDP. Cambridgeshire Constabulary suggestions for updates Greater Cambridge Local Plan IDP including to sections 14.1 Existing Situation, 14.2 Future Needs, Table 14.3 Priority Projects, Table 18.1- Cost summary for identified Infrastructure.</p> <p>For the NEC IDP we suggest amendments to Table 5.13, Table 6.1, Table 6.3.</p>	207496 (Cambridgeshire Constabulary)
<p>Policy I/ID: Infrastructure and delivery (p.669) - Add the term “and facilities” after ‘infrastructure’ in relation to each criterion 1-4</p> <p>Policy I/ID: Infrastructure and delivery - Supporting Information, para 10.69 (p.700) - After ‘healthcare’ in line 3 add “fire & rescue, police, ambulance”</p> <p>Infrastructure reference, para 10.70 (p.701) - After ‘delivery of’ in line 2 add “safe, cohesive, resilient”</p> <p>Infrastructure reference, para 10.3 and 10.74 Add “fire & rescue, police and ambulance”</p>	207487, 207519 (Cambridgeshire Constabulary)

<p>See attached IDP Addendum Evidence to assist with the update of both the Greater Cambridge Local Plan IDP and the North East Cambridge Area Action Plan IDP. Cambridge Fire and Rescue makes suggestions to update chapter 14 of the GCLP IDP, including modifications to section 14.1 Existing Situation, Section 14.2 Future Needs, Table 14.3 Priority Projects and Table 18.1- Cost Summary for identified infrastructure.</p> <p>Regarding the NEC IDP we make suggested amendments to section 5.5.3, Table 5-13, Table 6.1 and Table 6.3.</p>	<p>207520 (Cambridgeshire Constabulary)</p>
<p>13.2.1. "Facilities such as [...] Northstowe Community Centre offer integrated services, including libraries, leisure, health, and Early Years provision." We do not recognise this description. We note that all parties are currently in default of a S106 obligation providing for health and library facilities in Northstowe.</p> <p>15.2. We note that delivery of a Swimming Pool for Northstowe has been secured and are highly supportive of it being realised in line with the Phase 2 S106 agreement. We would welcome early engagement with SCDC as they form their strategy plan for delivery of essential infrastructure.</p>	<p>208073 (Northstowe TC)</p>
<p>It is recognised that it is important for all parties to plan so as to ensure there is sufficient infrastructure capacity to support and meet all the requirements arising from the new development, and at the time when they are needed.</p>	<p>211576 (Martin Grant Land Limited)</p>

Policy I/DI: Digital and telecommunications infrastructure

Abbreviations

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

Summary of Main Issues:

There was broad support for the policy's objective of promoting high-quality digital and telecommunications infrastructure to support communities, businesses and future technological innovation. Comments received welcomed the inclusion of requirements for digital connectivity within new development.

Comments were made seeking stronger requirements to ensure that new developments are provided with high-quality digital infrastructure from the outset. Comments highlighted ongoing difficulties in securing fibre broadband connections in some recently completed developments, particularly where roads remain unadopted or where leasehold and management arrangements create barriers to installation. Comments were also made regarding the need for the policy to remain flexible and responsive to future technological change.

Concerns were raised regarding the visual impact of telecommunications infrastructure. Respondents sought stronger measures to minimise street clutter, including telecommunications cabinets, masts and associated infrastructure, and requested greater use of underground ducting and coordinated infrastructure provision. Particular emphasis was placed on ensuring that telecommunications equipment is sensitively designed and sited, protects heritage assets and views, and does not obstruct pavements, active travel routes or the character of rural communities.

Additionally, concerns were raised regarding the thresholds that have been specified within the policy and the onus that the policy places on developers to secure upgrades that they would not be responsible for delivering.

Response to the 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 various concerns raised in relation to the visual and amenity impacts of digital and telecommunications infrastructure. Noting that some telecommunications infrastructure and specific network operators benefit from permitted development rights, which enable installation, alterations or replacement without the need for planning permission, in many cases the Councils have no means of objecting to the principle of such development. Where prior notification is required, the Councils may consider the siting and appearance of the proposal. Having reflected on the range of representations received, the Councils have proposed some targeted changes to the policy which respond to the points raised, so that in-combination (cumulative) effects of different telecommunications and digital infrastructure are considered when considering siting, and visual amenity effects are considered for all proposals. While a range of other considerations were highlighted, it is considered that many points raised are already addressed by the Local Plan in the round through other development management policies, for example those that address design and the historic environment for all applications.

Noting the challenges highlighted in some representations in relation to the timeliness of providing internet connections, the policy has been strengthened to require high-quality digital infrastructure is secured in tandem with build-out and occupation of commercial development and public buildings. The Building Regulations already require residential development to include gigabit-ready broadband physical infrastructure and a functional connection before first occupation.

Reflecting on the range of views put forward on the approach to securing the right telecommunications infrastructure to support development, the Councils believe that the proposed policy strikes an appropriate balance, establishing reasonable thresholds for the provision of necessary infrastructure and the assessment of existing infrastructure deficiencies. The policy is already clear that responsibility for delivering upgrades to mobile telecommunications infrastructure does not lie with applicants. However, noting emerging evidence that developments are increasingly being completed with inadequate outdoor mobile coverage (as cited in a [recent government consultation](#)), our view is it is not unreasonable for applicants to assess the potential impacts of their proposals on mobile coverage and enter into early engagement with network operators with a view towards securing necessary upgrades, as required by the policy.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Broadly support - however many new developments remain fibre inaccessible potentially due to unadopted roads or leasehold owner creating complicated installation requirements such as in blocks of flats.</p> <p>Planning permissions particularly for new developments should make access to full market of fibre providers an essential requirement for development. Some conditions/ covenants/ contracts etc to homeowners in developments are preventing access. In Orchard Park on Cranesbill Road some fibre providers won't install on unadopted roads and flat owners are forced to negotiation for years with management companies to get fibre installed.</p>	<p>204061 (Histon and Impington PC)</p>

We welcome criterion 1c.	210181 (Historic England)
There will be increasing numbers of devices and means of communication evolving. Internet of Things, LoraWAN those are the phrases with these additional machine to machine comms that will be part of life.	203384 (G Duck)
<p>I support Create Cambridge in asking that:</p> <ul style="list-style-type: none"> •further development of the local plan refers to the Create Cambridge Insights Report as evidence base with regards to the development of Cambridge’s digital cultural infrastructure •digital cultural infrastructure is recognised within infrastructure expectations/GCCIS •commitment to common metrics, aggregated data and measurement tools •digital capability is included within the definition of cultural infrastructure •the Cultural Infrastructure Pipeline incorporates shared platforms, interoperable systems, aggregated data tools and organisational digital capacity •low digital maturity is addressed, including that only 9.2% of venues currently use connected booking systems 	<p>202060 (H Chamberlain), 202145, 202313, 202890 (Cambridge Junction), 202327, 202760, 204180, 205414 (Cambridge Junction/ Create Cambridge), 202203 (H Tam), 202392 (J Webber), 202416 (T Shaw), 202429 (Kettle’s Yard), 202464 (K Jones), 202689 (T Altmann), 202719 (W Townsend), 202788 (S Lee), 202939 (R Tarry), 202969 (T Flinders), 203355 (N Ellis), S Ashworth (203444),</p>

	<p>203482 (L Heap), 203545 (D Lever), 203634, 203875, 205058 (University of Cambridge), 203854 (N Yeni), 204412 (New International Encounter), 204693 (NEUBAU Architecture Ltd), 204709 (A Giarlis), 204846 (L Matthews), 205109 (H Paterson), 205212 (J Walsh), 205321 (A C de Avedo Lamha), 205352 (L Howse), 205353 (N Oakley), 205413 (A Seiglow),</p>
<p>Section 1.a is insufficient. For new developments, the policy should be to prohibit pavement clutter. Especially as pavement clutter is a significant obstacle to active travel, which is one of the key policies. Either underground ducting, or adequate areas set aside for telecommunications and other infrastructure should be a requirement for all new development. Section 4 needs strengthening to match.</p>	<p>202628 (P Tribble)</p>

<p>Section 3 should allow for the minimum connection speed to be increased over time, as gigabit connections ought to be the minimum standard now and that standard should be expected to increase in the future.</p>	
<p>Girton Position Digital infrastructure should enhance connectivity without harming rural character or obstructing routes. Key Points: Village needs dependable broadband/mobile access. Telecoms installations must be sensitively sited. GPC Requests: Require sensitive design and siting. Protect heritage assets and views. Avoid obstructive street furniture.</p>	<p>202275 (Girton PC)</p>
<p>The thresholds set at 30 and 250 dwellings appear arbitrary and risk imposing significant technical and financial burdens, adding to the already extensive list of pre application requirements. These obligations—such as assessing mobile coverage, securing agreements with multiple providers, or accommodating future equipment—may be disproportionate for schemes that are not large strategic sites.</p> <p>Clearer coordination with utilities and network operators at plan making stage would help avoid ambiguity and reduce delays at application stage, ensuring that digital infrastructure requirements remain achievable, proportionate, and consistent with delivery viability.</p>	<p>204744 (Redrow South Midlands)</p>
<p>It is not clear that the draft policy offers protections equivalent to the current Local Plan policies 84 and 65. If this is the case, it should be addressed.</p>	<p>203019 (K Wiemer)</p>

<p>Given that the previous City-wide digital infrastructure upgrade to fibre optic cable left most pavements and road surfaces in a very poor condition, the policy should give the relevant authority the recourse to require immediate remedial work where needed. Previous upgrade work did cause harm to the highway and detrimental impacts to the safety of active travel infrastructure, with nothing done to rectify the harm.</p>	
<p>Lessons from previous digital infrastructure upgrades should be applied and the policy should require highways and active travel networks to be left in satisfactory unharmed condition after upgrade work requiring trenching and re-surfacing is completed. The policy is vague regarding the requirements of proposals in historic environments. More detail of what proposals would be assessed on beyond 'special regard' would be helpful. Clarity regarding notified neighbour lists for planning applications would be helpful, especially if the requirement for pre-consultation is dropped. At a minimum, all properties that would lose visual amenity and those close to the site should be notified.</p>	<p>208624 (Madingley Road Area Residents Association)</p>
<p>Policy I/CM sets out how developments should contribute to Greater Cambridge's access to broadband, telecommunication infrastructure and smart infrastructure.</p> <p>For telecommunications infrastructure, part 6 requires for schemes of 30 or more dwellings to include suitable infrastructure that would support any future rollout of appropriate telecommunications equipment such as small cell mobile communications technology or mobile masts and towers. CIP do not object to the principle of the policy but request the wording is updated to ensure full responsibility is not placed on the developer to provide the appropriate infrastructure.</p>	<p>204493 (Cambridge Investment Partnership)</p>

<p>It is requested that the wording is amended to ensure liability is not solely placed on the developer to provide digital and telecommunications infrastructure.</p>	
<p>Wysing Arts Centre and Create Cambridge asks that:</p> <ul style="list-style-type: none"> Reference should be included in the local plan to the Create Cambridge Insights Report as evidence base with regards to the development of Cambridge's digital cultural infrastructure. digital cultural infrastructure is recognised within infrastructure expectations/GCCIS commitment to common metrics, aggregated data and measurement tools digital capability is included within the definition of cultural infrastructure the Cultural Infrastructure Pipeline incorporates shared platforms, interoperable systems, aggregated data tools and organisational digital capacity low digital maturity is addressed, including that only 9.2% of venues currently use connected booking systems 	<p>205155 (Wysing Arts Centre)</p>
<p>EEAST would also request ensuring modern building construction does not impinge on phone/broadband signals – thereby requiring boosters which use more energy. A policy which supports homes and commercial premises are built for modern connectivity as the more equipment requires the use of internet/WiFi.</p>	<p>210346 (East of England Ambulance Service NHS Trust)</p>
<p>EEAST would highlight the need for increasing demand for digital connectivity for emergency services and direct links to hospitals. The ability for rural areas to have access to superfast broadband as this will help farm/rural live diversification and building of business that will help keep employment local to smaller villages, hamlets and individual farms.</p>	<p>210347 (East of England Ambulance Service NHS Trust)</p>
<p>The supports the principle the policy regarding developments contributing to broadband and telecommunications infrastructure but suggests that the wording should be revised to clarify that</p>	<p>204917 (Hill)</p>

<p>developers should not bear full responsibility for infrastructure that is typically provided by third parties or statutory undertakers.</p>	
<p>Paragraph 6 states that “planning applications that include either 30 dwellings or more, or commercial floorspace of 1,000m2 or more must include suitable infrastructure that would support any future rollout of appropriate telecommunications equipment such as small cell mobile communications technology or mobile masts and towers.” While the principle of future proofing development is supported, it is unclear how applicants are expected to deliver or secure infrastructure that is ultimately dependent on network operators’ investment decisions, which are outside the control of developers.</p>	210275 (Vistry Group)
<p>Paragraph 7 requires that “planning applications that include the development of either 250 dwellings or more or 10,000m2 or more commercial floorspace must assess the suitability of mobile coverage... and, where mobile coverage deficiencies are identified, provide details of proposed improvements and agreements with network operators or neutral host providers.” Vistry and The Quay Estate consider this requirement to be disproportionate, as developers have no direct control over mobile network coverage or the delivery of off-site upgrades, in a similar manner to utilities such as water and electricity.</p>	210276 (Vistry Group)
<p>We are pleased to see that the IDP references the WCS evidence document and includes the need for investment at WWTWs to accommodate the growth outlined in the Local Plan. Future needs are also referenced, along with the current engagement Anglian Water is undertaking with key external stakeholders to find solutions to capacity challenges, including around solutions for Cambridge WWTW following the withdrawal of funding for the relocation project. We note the IDP may be updated with further information on priority investments once the next version of the DWMP is published and capacity</p>	211187 (Environment Agency)

<p>solutions have been identified. We encourage an update to the document to ensure the evidence base remains sufficient over the lifetime of the plan.</p>	
<p>Digital connectivity is essential infrastructure. Policy TI/3 should explicitly require high-quality broadband provision, including fibre or equivalent, in all new developments. Particular attention must be given to rural areas, where poor connectivity risks deepening inequality and undermining economic viability, remote working, education, and access to healthcare. This approach aligns with NPPF paragraph 114 and the Town and Country Planning Act 1990.</p>	<p>208955 (CPRE Cambridgeshire and Peterborough)</p>
<p>It is recognised that it is important that developments contribute to Greater Cambridge's access to broadband, telecommunication infrastructure and smart infrastructure.</p>	<p>211577 (Martin Grant Land Limited)</p>

Policy I/CM: Construction management

Abbreviations

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

Summary of Main Issues:

There was general support for the overall aim and intention of the policy, with several responses acknowledging its importance in ensuring proportionate measures are implemented to mitigate potential adverse impacts on the environment and amenity during the construction of development

Comments were made around the details required to be contained within DMPs, CEMPs and DCEMPs and several respondents requested the policy should make reference to various additional requirements, including minimising flood risk, maintaining travel routes, imposing strict working hours and protecting school routes. One response suggested that temporary impacts on the public realm and accessibility caused by construction should also be considered and assessed when planning applications are submitted.

Cambridge Past Present and Future suggested a policy requirement requiring developers to repair damage and compensate the highway authority for accelerated wear of the public highway via a formula for calculating the cost of accelerated wear to the road network. This would enable developers to estimate costs in advance and funds to be secured on completion of the development.

Several respondents queried whether the policy would, in effect, require Noise and Vibration Demolition Environmental Management Plans, Construction Environmental Management Plans or combined DCEMPs as a validation requirement at

application stage. Some requested a more flexible approach to managing construction impacts, with the level of documentation managed on a case-by-case basis and the use of standard planning conditions where minimal impacts are likely.

Response to the main issues raised in representations

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

In light of the comments received, the Councils have reviewed and updated the list of matters DMPs, CEMPs and DCEMPs should address, adding additional information to ensure that management plans have fully considered the impacts of construction. In response to comments raised around the impact of construction projects on the condition of highways, the policy has been revised to require details of how appropriate highways monitoring will be carried out where they impact on non-adopted highways. Noting the Local Highways Authority already has legal powers to recover costs in relation to adopted highways, the proposed amendment to the policy focuses on non-adopted highways where the costs of repairs would need to be borne by individuals. The Councils deem that other issues raised in representation around the detail required in management plans are adequately addressed in the policy and the Sustainable Design and Construction Supplementary Planning Document (SPD), which provides further, more detailed guidance around how such plans should be prepared.

As is set out in the supporting text of the policy, there is a preference for DMP's, CEMP'S or DCEMPs to be submitted as part of the planning application for a proposed development, rather than being sought later by way of condition particularly where demolition and/or construction could have a significant adverse impact on nearby sensitive premises or natural assets. These plans are sought at the point of application to allow officers to fully consider the potential impacts when assessing a planning application.

The Councils have reflected on the responses received and taken the decision to retain the proposed requirement for DMP's, CEMP'S or DCEMPs to be prepared for all major development and other development that is likely to lead to adverse impacts. The Councils deem this not to be an unreasonable requirement given the policy allows flexibility around the level of detail that will be required, which will be proportionate to the scale and nature of the proposed development and determined on a case-by-case basis.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
We are broadly supportive of this policy. We have learnt through recent experience of major development in greenbelt to the east of Stapleford that clause 2j on p708 (compliance monitoring) is critical; however, the emphasis should not be on self-monitoring by the constructor but should instead sit with the LPA/planning enforcement.	201650 (Stapleford PC), 210962 (Great Shelford PC)
Construction must avoid severance, protect school routes and minimise flood and noise impacts.	202276 (Girton PC)
Traffic management is essential during works. Construction can worsen flooding if drainage is disrupted. Dust/noise affect wellbeing.	207169 (Girton PC)
Girton Parish Council request the Councils require Construction Management Plans to Maintain Active Travel routes, avoid disruption to brooks/drainage, protect schools access and impose strict working hours.	207170 (Girton PC)
We support the policy in full.	201981 (Swavesey PC)

<p>Include to the policy as a requirement</p> <ul style="list-style-type: none"> • For applications to include a full assessment of impact on the public realm during construction. • For developers to repair damage and compensate the Highway Authority for accelerated wear of the public highway. • Set (in agree with the Highway Authority) a formula for calculating the cost of accelerated wear so that developers can estimate it in advance, and price it in. 	<p>204380 (Cambridge Past, Present and Future)</p>
<p>The policy requires a Noise and Vibration Demolition Environmental Management Plan, a Construction Environmental Management Plan, or a combined DCEMP for all major development and any development that may have adverse effects during construction.</p> <ul style="list-style-type: none"> • The requirement is very broad and could capture relatively small schemes unnecessarily. • It mandates multiple documents before commencement, even where a lighter touch approach would be proportionate. • Statutory control of construction noise and nuisance already exists under the Control of Pollution Act 1974 and Environmental Protection Act 1990, risking duplication. We suggest making the following change to the policy: Introduce wording that allows the extent of documentation to be proportionate, e.g.: "...proportionate to the scale, nature and likely impacts of the development, and may not be required where impacts are minimal or can be addressed through standard planning conditions." 	<p>204745 (Redrow South Midlands)</p>
<p>While responsible construction management is essential, particularly on large strategic site the policy adopts an overly broad and inflexible approach that risks capturing development where such detailed documentation is disproportionate or unnecessary. A more flexible approach would allow the local</p>	<p>208996 (Barrat Homes Northampton)</p>

<p>planning authority to determine the appropriate level of documentation required on a case-by-case basis, avoiding unnecessary burdens while still securing robust mitigation where justified.</p>	
<p>Paragraph 1 of the policy states that “all major development, infrastructure development or development that, due to its nature or location, is likely to have an adverse impact on the local environment and amenity during construction must be informed by a Noise and Vibration Demolition Environmental Management Plan (DMP) and Construction Environmental Management Plan (CEMP), or a combined Demolition and Construction Environmental Management Plan (DCEMP), which should be agreed by the Local Planning Authority prior to the commencement of development.”</p> <p>It is unclear whether this requirement is intended to operate as a validation requirement at application stage or whether such document are expected to be secured by a planning condition. Vistry and The Quay Estate consider that this requirement should be secured through appropriately worded planning conditions rather than as a policy requirement at plan level.</p>	<p>210277 (Vistry Group)</p>
<p>The requirements set out in paragraph 2 of the policy would be more suitable addressed through the use of standard or bespoke planning conditions.</p>	<p>210278 (Vistry Group)</p>
<p>Modern Methods of Construction are able to utilise schemes such as Prisoners Build Homes which have successfully reduced reoffending rates, provide skills and employment post release. Similar schemes exist for those preventing and entering the justice system.</p>	<p>210348 (East of England Ambulance Service NHS Trust)</p>
<p>It is recognised that it is important that construction management details are agreed with the local planning authority prior to the commencement of development.</p>	<p>211578 (Martin Grant Land Limited)</p>

