

Consultation Statement

Appendix 6: Response to Representations - Development Strategy



Greater Cambridge Local Plan

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



GREATER CAMBRIDGE
SHARED PLANNING

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Development Strategy

Note that representations submitted to the overall Development Strategy chapter, Policy S/JH: New jobs and homes and Policy S/DS: Development Strategy have been presented below in a single set of tables addressing topics relevant to the jobs and homes requirements and development strategy, and this has informed the executive summary and response to representations.

Vision and Strategic Priorities

Abbreviations

PC= Parish Council DC= District Council TC= Town Council CA= Combined Authority GC= Growth Company

Summary of issues arising from Draft Local Plan representations:

A number of comments supported the vision and strategic priorities.

A limited number of respondents made recommendations for amendments to the vision and strategic priorities, including suggestions for increasing reference to meeting Government's agenda to accelerate employment and housing growth, adding emphasis on the area's heritage and landscapes, reflecting the importance of green spaces for wellbeing, and adding specific reference to emergency services.

A limited number of respondents raised concern that the housing target and development strategy do not align with the vision.

Response to main issues raised in representations

Support for the vision and strategic priorities is noted.

The Councils consider that the draft plan vision and strategic priorities remain appropriate and have not made amendments in response to representations made at draft plan stage, noting that amendments were made at draft plan stage to add greater emphasis on supporting the economy, that both the vision and strategic priorities already reference our locally distinctive heritage and landscapes and unique character and identities of Cambridge and South Cambridgeshire. Whilst we acknowledge the importance of greenspaces for wellbeing, green spaces provide cross cutting benefits relevant to a number of the strategic priorities. The strategic priorities should be understood collectively; the Councils consider that it would reduce the clarity of the priorities to make cross-references between them. Adding references to specific services such as emergency services is considered too detailed for these strategic level priorities.

Whilst choices made to inform the preferred development strategy inevitably require a balancing between issues included within the vision and strategic priorities, the vision and priorities have informed the development strategy principles and thereby the strategy itself. The Councils therefore consider that the development strategy is aligned with the vision and strategic priorities.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Comments on Vision include:</p> <ul style="list-style-type: none"> • Vision for Greater Cambridge will result in its continued urbanisation. • Vision for Greater Cambridge would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development on the edge of Cambridge and at the more sustainable villages (Willingham, Fulbourn, Sawston, Great Abington, Great Shelford, Fen Ditton, Swavesey) • Housing target and development strategy in the draft GCLP do not align with the Vision for Greater Cambridge, particularly regarding quality of life and carbon emissions. • Supports decrease in our climate and environmental impacts with a continued flourishing internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities. • Need for Vision and the emerging Local Plan to be strengthened to refer to the importance of development delivery within Ox-Cam Arc and meeting Government’s agenda to accelerate employment and housing growth within the arc. • Vision must recognise the internationally valued heritage and landscapes of Greater Cambridge. The vision should also recognise that there are potential conflicts 	<p>201902 (C Deer), 201940 (KG Moss Will Trust & Moss Family), 201964 (Shelford Investments), 202073 (J Francis), 202118 (Elsworth PC), 202336 (P Deer), 202433 (The CLC Trust), 202554 (Ely Diocesan Board of Finance), 202729 (Cambridge Past, Present and Future, 202897 (Cambridge Past, Present and Future), 205036 (North Barton Road Landowners Group), 203302 (J Manning), 203889 (Hill Residential (Fulbourn Site)), 203916 (Hill Residential (Sawston Site)), 204126 (Hill Residential (Hardwick Site)), 204340 (Hill Residential (Great Abington Site)), 204518 (Axis Land Partnership and Executors of Norman Winfrid Moore), 204525 (Axis Land Partnership and Executors of Norman</p>

<p>between economic growth and the climate, physical and environmental capacity of the area. The vision should be to explicitly manage and mitigate these conflicting aspirations.</p> <ul style="list-style-type: none"> • why doesn't the Vision rely on the mix of development strategies outlined in the Spatial Strategy as a whole. There is no specific reference to the type of development or its location. Recommends the Plan Vision be updated to clarify the range of development locations to be utilised to meet demand for housing and other types of development. 	<p>Winfrid Moore), 208673 (Guilden Morden Developments Ltd)</p>
<p>The respondent supports the vision for Greater Cambridge, emphasising the need for a Local Plan that sets ambitious growth targets and aligns with national policy as per Paragraph 36 of the NPPF 2024.</p>	<p>204468 (Ceres Property)</p>
<p>Supports the vision and the seven strategic priorities that flow from it. Clarity would be improved if the order is changed, and the inter-relationships are explained.</p>	<p>203411 (Juniper)</p>
<p>The ordering of the development priorities contradicts the fundamental aim and purpose of the Green Belt legislation and the national planning policy framework that enshrines it. This inconsistency was noted during the planning appeal that led to the recently completed new retirement village on the Gog Magog hillside outside Stapleford.</p> <p>More detail is supplied in the attached document which addresses the relationship between the S/DS and S/GB policies and proposes refinements in the section starting on page 3.</p>	<p>203009 (M Foote)</p>
<p>Recommends modification of the Wellbeing and social inclusion priority to read, "Help improve equality of access and opportunities for people in Greater Cambridge to lead</p>	<p>201528 (Stapleford PC), 208088 (Great Shelford PC)</p>

<p>healthier and happier lives, ensuring that everyone benefits from the development of new homes, jobs AND ACCESS TO NATURE AND GREEN SPACES.” Access to nature and green spaces is also vital to leading healthier and happier lives and will be increasingly important as housing density increases and where apartments are the major form of housing.</p>	
<p>Concern if developers will deliver on the plan’s Well Being/Social Inclusion aspirations.</p>	<p>201902 (C Deer), 202118 (Elsworth PC)</p>
<p>Comment that the plan should make specific reference to the emergency services in Strategic Priority: Connectivity & Infrastructure, and para 2.26.</p>	<p>207473 (Cambridgeshire Constabulary), 207506 (Cambridge Fire and Rescue Service)</p>
<p>The current Plan is seen as not fully aligning with the Vision due to an over-reliance on strategic housing sites, which account for 93% of allocations, risking environmental impact and lack of housing variety. The Sustainability Appraisal 2025 raises concerns about development 'jumping' the green belt, leading to less accessibility to services and facilities, contradicting the Plan’s Vision and NPPF sustainability principles.</p>	<p>204941 (Miller Homes)</p>
<p>Responder welcomes a Draft Local Plan that clearly acknowledges Greater Cambridge's national and global significance and plans positively for its continued success. The Plan sets out a strong and integrated approach to growth, recognising the need to align economic expansion with housing delivery, infrastructure provision and environmental stewardship.</p>	<p>208130 (Albion City Development Corporation)</p>

<p>Natural England welcomes the strategic priorities of the Local Plan and are pleased to note that the Vision for Greater Cambridge, includes the aspiration for a big decrease in climate and environmental impacts, and increase in the network of nature, wildlife and multi-functional green spaces.</p>	<p>207600 (Natural England)</p>
<p>Anglian Water is supportive of the seven strategic priorities set out in the Vision, particularly those that align with our long-term strategic ambitions.</p> <p>We support direct reference to higher achievable standards for water use to reduce environmental impacts. Anglian Water is directly engaged with the Cambridge Water Scarcity Group, as we jointly bring forward strategic supply options with Cambridge Water - including the Grafham to Cambridge strategic pipeline (Phase 1 of the 70km Grafham to Rede pipeline) and the Fens Reservoir.</p>	<p>209156 (Anglian Water Services Ltd)</p>
<p>Responder supports –</p> <ul style="list-style-type: none"> • I. Cross Boundary Matters – matters where more discussion and consideration must be given, such as ensuring connectivity is considered to key employment and international connectivity to London Stansted Airport and Chesterford Research Park • II. Growth and Infrastructure Delivery – the Plan ensures development will be accompanied by the right infrastructure. • III. Strategic Priorities – inclusion of climate change as a strategic priority, welcomes that the Plan seeks to address water supply matters. 	<p>210457 (Essex County Council)</p>

<ul style="list-style-type: none"> IV. Economic Growth – welcomes that the fast-growing economy is driven by successful partnerships between academics, business, investors and local government, and the commitment to sustainable and inclusive growth. 	
<p>Responder supportive of Local Plan, key themes and strategic priorities, and strategy directing growth to the Cambridge Urban Area, the edge of Cambridge, and new settlements, recognising that that a range of sites will be required. However, ensure that an appropriate proportion of medium scale sites are allocated, such as site at Fen Ditton, to enable a broad mix of tenures and dwelling types, including affordable housing, providing flexibility ensuring housing requirements are met within the plan period.</p>	210219 (Vistry Group)
<p>Requests to avoid the Plan being of “very limited weight” upon adoption, Greater Cambridge should strive for a Local Plan that is in full alignment with the emerging national policies for decision taking and positively prepared in this regard.</p>	208255 (Ashwell & Morden Landowner Consortium)
<p>Concern growth is in the wrong direction of travel for our fen and Riverlands, soon to be subjected to sea level rises, not factored in?</p> <p>Would not leave 'Paradise' for the urban sprawl of Marleigh by Marshalls, densely-packed new-build, identikit passive units, the current City Council orchestrated - with questionable pride? The Cambridge Brand will have tarnished further by 2045.</p> <p>Build communities where there's a real need, not here in such a trumped-up and contrived fashion.</p>	208872 (R Lambert)

<p>Responder states Fulbourn wants more affordable houses. Notes land around Fulbourn that could be considered for development with no plans to build on it, other than Ida Darwin Site. Also need for green amenity land to the South of the village, noting an area to the North of Fulbourn train tracks that is not developed.</p>	<p>208728 (Cllr Matthew Morgan)</p>
<p>Responder highlights lack of identified sites around the Cambridge to Newmarket railway noting Dullingham and Six Mile Bottom, with double tracking and extra/enhanced stations as a project with potential to be funded if there is political support, noting the Cambridge Growth Company, and it is more likely if development is suggested there.</p>	<p>208729 (Cllr Matthew Morgan)</p>
<p>The scale of growth, and the density in proposed development sites is underwhelming. I think there is a lack of ambition for the growth of Cambridge. Mid Rise up to 10-15 Storeys might be considered near good transport links. We should make absolute most use of well-connected sites, otherwise valuable transport infrastructure is going to be underused.</p>	<p>208730 (Cllr Matthew Morgan)</p>
<p>Concern strategy does not cater for the needs of local communities across Greater Cambridge, such as Great Shelford. The vision sets out an appropriate aspiration, the policies do not facilitate the delivery of non-strategic sites that don't require extensive infrastructure, which are required to provide the homes required in response to local communities housing needs. This will result in significant consequences on the ability of local communities accessing good quality housing and further perpetuates the existing affordability issues present in the area.</p>	<p>208898 (Nightingale Land and Hill Residential Ltd)</p>
<p>Land West of Beach Road, Cottenham: Objects to Development Strategy</p>	<p>208772 (Croudace Homes)</p>

<p> Ignores the sustainability benefits of homes in rural areas for community resilience and is flawed. Additional small sites should be allocated to ensure delivery rates early in the plan period in sustainable villages, including at Land West of Beach Road, Cottenham.</p>	
<p> Mingle Lane Site Regarding delays, local and national housing crisis and affordable housing need in Greater Cambridge, and connectivity to Shelford Train Station, apposes deletion of proposed allocation at Mingle Lane. Site development assists delivery of a number of benefits to the local community including market and affordable housing needs as identified in the recently made Stapleford and Great Shelford Neighbourhood Plan (SGSNP). The SGSNP was developed on the understanding that the Local Plan would allocate the site for development to meet the identified housing needs. Consequently, the site should be reallocated for development within the draft Local Plan.</p>	<p> 208897 (Nightingale Land and Hill Residential Ltd)</p>
<p> Comments general Vision for Greater Cambridge and the seven Strategic Priorities are supported.</p> <p> Concern Development Strategy seen as misguided, reliance on new settlements and complex major development sites, reliant on infrastructure projects, overly optimistic delivery timescales of proposed draft allocations, and risk will fail to deliver the homes it needs within the plan period to support its economic ambitions.</p> <p> Suggest more balanced approach to spatial distribution needed recognising the role of</p>	<p> 209964 (Granta Land Ltd)</p>

<p>established, sustainable settlements served by existing high-quality public transport infrastructure, and which reduces the reliance on the private car. Stapleford and Great Shelford highlighted as sustainable villages.</p>	
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Policy S/JH: New Jobs and Homes

Abbreviations

PC= Parish Council DC= District Council TC= Town Council CA= Combined Authority GC= Growth Company

Summary of issues arising from Draft Local Plan representations:

Support for the identified housing need noting it aligns with the National Planning Policy Framework's goal to boost housing supply. Support also for the aim to provide 73,300 jobs and a diverse range of local employment opportunities, and commitment to sustaining and expanding globally significant research, science and technology sectors and the innovation cluster.

Objections to identified housing and employment need or comments that they are too conservative and should be revised upwards to reflect the capacity of the Cambridge economy, proposed infrastructure developments, and to reflect the ambitions of the Local Growth Plan. Comment that the job figure will likely need to evolve to align with the Government's broader growth agenda whilst ensuring the vision can be achieved sustainably. Cambridge Growth Company would like to see the Plan more explicitly recognise the value of intensifying and expanding the identified innovation clusters to fully realise growth potential and agglomeration benefits.

Comments on employment include that the plan is predicated on the creation of 73,000 jobs and the major strand of this is the knowledge economy, that the evidence base underestimates the need for storage and distribution floorspace, and that forecast R&D office employment floorspace need is already met by supply.

Comments regarding the approach taken to jobs and homes forecasts including the lack of lack robust, up-to-date evidence on jobs, and support for the use of local data to best inform the modelling of jobs and housing growth, and particularly headroom for growth, and commitment to a diverse mix of housing types and tenures, including affordable housing. Comments that it does not reflect the evidence base, that there is increasing disparity between the jobs target and the housing target, and that the approach to commuting assumptions is not justified.

Suggestion that the figures should be treated as minimum employment space requirements and allow for appropriate flexibility, including to go beyond the High Growth scenario.

Comment that the plan should shift from a growth-led strategy to a resource constrained model, recognising the region's environmental limits, that planning for growth in workspaces that outpaces housing supply does not support the stated environmental and transport aspirations and more emphasis should be on limiting the number of workspaces so new homes have the intended effect of making homes more affordable. Comment that there needs to be stronger rural proofing to ensure neighbourhood targets, specialist housing and job growth are aligned with rural transport, digital connectivity and community infrastructure capacity.

Comments that the Statement of Common Ground is not clear how many houses will be built in neighbouring areas and whether there is any unmet need for neighbouring authorities to be considered. Comment from Huntingdonshire District Council that aligning housing figures with the government's standard method will avoid overburdening local infrastructure and resources, and potentially needing to seek assistance from neighbouring authorities to meet a portion of the enhanced housing figure. Comment from West Suffolk Council confirming it is not seeking to accommodate any housing need identified in Greater Cambridge. Essex County

Council comment that it is important there is acknowledgement of the cross boundary and strategic matters, in particular the opportunity provided for international connectivity by London Stansted airport, and to seek to improve connectivity.

Concern that new infrastructure may not be delivered in a timely manner given the speed of build out and to the extent that is required. Comment from Anglian Water that the scale of growth funded in their Business Plan does not sufficiently reflect the scale of growth pressures or the level of funding to address them. Comment there is a need for more housing and water for existing residents and that it cannot be met within climate targets.

Comments on housing include support for the focus on delivering a diverse mix of housing types and tenures, including affordable housing, comment that increasing supply should reduce house prices and make homes more affordable for people working in Cambridge but risks being undermined without legislation to prevent the purchase of accommodation for short term letting, and suggesting an appropriate mix of social, affordable and market housing. Objection that the policy is too prescriptive on the tenure for older person's housing and should support the full range of specialist housing across all tenures, and comments that there is insufficient provision for nursing and residential care spaces and that the necessary specialist housing will not be delivered within the plan period. Comment from Cambridgeshire County Council for further clarity regarding the relationship between the accommodation needs for older and disabled people included in the policy, and the County Council's demand profiles which include a much lower need. Request also for clarity between the overall housing requirement and the requirements for accommodation for specific groups and the source of the information for the accommodation needs of specific groups. Comment from Anglia Ruskin University that student accommodation need should reflect more up to date evidence.

Comments that the housing requirement for neighbourhood plans should be indicative and not a requirement, and comment from a developer suggesting an additional section should be added to include provision for housing in areas that are not neighbourhood

plan areas. Comment that there is no mechanism to be able to deliver the identified local affordable housing need. Comment that there is a discrepancy in the annual housing need between Policy S/JH and Appendix D.

Response to main issues raised in representations:

Iceni Projects for the Councils completed a Review of economic data, context and representations 2026 (REDCR 2026) to consider whether the most likely employment forecast identified in the Employment and Housing Need Update 2025 (EHNU 2025) for the draft plan remains robust for the Proposed Submission Plan. The focus of the Local Plan evidence has been. Having considered in detail datasets on sector by sector performance, Iceni's scenarios are considered realistic and embedded in past trends of known change, including periods of strong growth, but also taking into account periods of cyclical slow down – as being experienced at present. The Cambridgeshire and Peterborough Local Growth Plan and MCHLG Oxford Economics work cited by many respondents are noted. Their baseline outlooks provide useful reference points for the data review described above; their aspirational scenarios have been discounted for the purposes of Local Plan making evidence which is an exercise focused on wholly evidencable historical sector and economy wide data. In summary, the most likely forecast for jobs for the plan period identified at draft plan stage remains robust for the Proposed Submission Plan.

The REDCR 2026 also considered representations regarding industrial and warehousing land needs. The requirement for the industrial and warehousing space (317,000 sqm, rising from 200,000 sqm in previous work) has been developed considering a range of factors which are compliant with the Government's planning practice guidance and take a very positive approach to industrial needs. The finer grain interpretation of specific technical adjustments raised in a number of comments is a matter of professional judgement. In summary, the industrial and warehousing employment land need for the plan period identified at draft plan stage remains robust for the Proposed Submission Plan.

With regard to comments relating to the identification of the total housing need, the approach set out in the EHNU 2025 follows an approach to identifying housing need associated with jobs that has remained consistent throughout the plan-making process. In summary, the draft plan stage most likely scenario for employment remains robust; the June 2025 Standard Method calculation outcome would provide enough homes to support that most likely jobs outcome; and the up to date June 2026 Standard Method calculation outcome is very similar to the June 2025 calculation. Therefore, the Councils consider that the June 2026 Standard Method calculation represents Greater Cambridge's objectively assessed need for housing because it would support the most likely jobs outcome. Regarding commuting assumptions, the 2011 Census is used in the EHNU 2025, considering the issues at the time of the 2021 Census (pandemic enforced work from home). As a result, this means the Greater Cambridge modelling assumes a greater draw from other areas than the 2021 Census implies. This is the same approach taken as in previous iterations of the work. The Plan's Standard Method requirement already incorporates an uplift for affordability in its calculation, therefore further uplifts are not considered suitable.

The objectively assessed needs for jobs and homes identified in Policy S/JH are not maximum targets. Policy S/DS identifies sites for homes and employment land that provide significant headroom above our needs.

We note comments relating to taking a resource constrained approach. The Local Plan is required to identify and meet our objectively assessed needs for development. The Local Plan Sustainability Appraisal has considered the environmental, social and economic implications of the needs set out in Policy S/JH. A very significant evidence base supports the Proposed Submission Plan to ensure that it can be delivered, and to ensure that environmental impacts are mitigated, including for example addressing water supply and impact on nature sites. The Councils recognise that there can be tension between supporting continued economic growth and improving housing affordability. It would be inconsistent with national policy to seek to limit economic growth; our

identified housing need includes a housing affordability uplift to help address the housing affordability challenge. Delivery of sites identified in Policy S/DS, together with relevant thematic policies elsewhere in the plan, will support delivery of a significant number of affordable homes.

The Councils have continued to engage with Anglian Water since the draft plan stage regarding ensuring waste water treatment capacity to meet the development included in the Plan. See further responses to this issue and to other comments regarding delivery of infrastructure under Policy S/DS.

Based on regular engagement with relevant bodies throughout our plan-making process, the Councils have not asked neighbouring districts to meet their development needs; nor have we been asked to meet the development needs of other districts. Full details of our approach to cross-boundary issues including development needs are set out in our Duty to Cooperate Statement of Compliance and Statement of Common Ground.

Our Housing Needs of Specific Groups Update for Greater Cambridge (HNSG, 2025) considers the specialist accommodation needs of older people and people with disabilities. The two groups are considered together as: there is a clear link between age and disability, the population aged 75 and over is used in the modelling as a proxy for calculating the need from all ages of older people and people with disabilities, and some specialist housing provided can be used by both older and disabled people. The HNSG 2025 makes clear that the current and future demand for specialist accommodation is influenced by a host of factors, including the balance between demand and supply in any given area and social, political, regulatory and financial issues. Additionally, it highlights that the extent to which new homes are built to accessible and adaptable standards may, over time, have an impact on the demand for specialist accommodation for older people, as they often want to remain at home rather than move to care. The Local Plan therefore seeks to ensure that a variety of types of accommodation for older people and disabled people are

provided across Greater Cambridge. As well as meeting the specific identified needs through standalone developments for specialist housing and through provision within strategic sites, other policies in the Local Plan such as Policy H/HM and Policy H/SS, alongside Cambridgeshire County Council's proposed increased hours for domiciliary care and the use of technology enabled care, will help older people and disabled people to downsize or stay within their community. The supporting information to Policy S/DS provides a summary of how the accommodation needs of older people and people with disabilities will be met, and further detail is provided in Appendix 12 of the Development Strategy Topic Paper (2026).

The HNSG 2025 highlights that whilst the calculations undertaken to identify the accommodation needs of older and disabled people are compliant with national planning practice guidance, they potentially overstate the level of need. The study therefore also references Cambridgeshire County Council's demand profiles for older people and disabled people, both of which have been calculated using a different approach to assessing needs focussed on local data sets, informed by local knowledge, and based on population forecasts linked to dwelling stock estimates. These dwelling stock estimates take account of housing trajectories published in 2022, reflecting adopted Local Plan housing requirements. Whereas the specialist accommodation needs for older people and disabled people in the HNSG 2025 have been calculated taking account of population forecasts linked to the standard method of calculating local housing need.

The supporting information sets out the evidence base documents used to inform the requirements for the accommodation needs of different groups, and it also explains that the overall housing requirement identified in the policy addresses the needs of the total population, and that the needs for affordable housing and specialist housing for specific groups form part of this total need and are not additional to it. The accommodation needs of the different specific groups have been calculated within the context of the overall housing need (calculated using the standard method) as set out in the HNSG 2025.

Any proposals for self-contained specialist housing for older people and disabled people are required by Policy H/AH to provide at least 40% of the new homes on-site as affordable housing, unless off-site provision or a financial contribution is justified. The policy requirement has been amended to remove the specific numbers relating to market and affordable units, as the delivery of a mix of tenures is required through other policies within the plan.

Officers have continued to engage with Anglia Ruskin University (ARU) during 2026, and as a result of the information provided the identified need for student accommodation from ARU has been amended. The Councils' consideration of student accommodation needs, and the calculation of the updated need, is included in Appendix 13 of the Development Strategy Topic Paper (2026). Identifying a level of need within the Local Plan does not prevent ARU from seeking to increase the proportion of students living in purpose built student accommodation during the plan period, or from bringing forward proposals for additional purpose built student accommodation beyond their level of identified need. It also does not prevent student accommodation from being brought forwards in the second half of the plan period, for which the Councils are not seeking to identify a specific level of need due to there being a greater uncertainty in anticipated growth in student numbers during this period.

Our response to representations relating to the neighbourhood area housing requirement is included within the response to representations on Appendix D (now Appendix C) of the Local Plan. The housing requirements for neighbourhood areas are specifically set out in response to a requirement within national planning policy, and it is not necessary to set out housing requirements for all parishes as the Local Plan already includes a development strategy, allocations and policies for windfall developments that indicate the level of housing that is appropriate within a settlement or parish. Neighbourhood Plans are not required to plan for housing needs, and the neighbourhood area housing requirements are therefore not relied upon to meet the overall local housing need identified in the Local Plan. The proportion of the identified need 'distributed' to neighbourhood areas is already anticipated to come forwards as windfall developments across Greater Cambridge. If there are specific local housing needs

identified in a parish or settlement, these can be addressed through a Neighbourhood Plan, or windfall developments. The housing requirements for the 27 designated neighbourhood areas that are set out in Appendix D (now Appendix C) of the Local Plan are for the plan period of 2024-2045, and are not annual requirements. These housing requirements are a proportion of the overall housing requirement for Greater Cambridge within the plan period, and therefore will not add up to the annual housing requirement or the plan period housing requirement set out in Policy S/JH.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the identified housing need, noting that it aligns with the National Planning Policy Framework's goal to boost housing supply based on local needs.	203045 (Cemex UK Properties Ltd), 204105 (G W Balaam & Sons), 211261 (Terra Strategic)
Support for requirement of providing a minimum of 48,195 homes and need for affordable housing	211456 (Hayfield Homes Construction Ltd)
<p>Support for the approach to employment:</p> <ul style="list-style-type: none"> • Support for draft Policy S/JH, which aims to provide 73,300 new jobs and a diverse range of local employment opportunities. • We support the Plan's commitment to sustaining and expanding globally significant research, science and technology sectors, alongside its clear recognition that housing delivery must keep pace with job growth if Greater Cambridge is to remain inclusive and competitive. The scale of employment and housing growth identified in the Plan reflects Greater Cambridge's pivotal role in the UK economy. Planning positively for this growth is essential if the full benefits of its world-leading science and innovation base are to be realised. 	204649 (Jaynic), 208131 (Albion City Development)
Objections to identified housing and employment need or comments that they should be revised upwards, including for the following reasons:	202364 (CLC Trust), 203307 (J Manning), 205140 Home Builders Federation, 201945 (KG Moss Will

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • The Central growth scenario of 73,200 jobs is seen as conservative and not reflective of the full growth capacity of the Cambridge economy – the higher growth scenario as acknowledged in the Employment and Housing Needs Update should be used in policy revisions. • Oxford Economics evidence points to substantially higher levels of job creation • The 2025 Employment and Housing Needs Update should be recalculated to include commuting patterns adjustment as per the 2023 Greater Cambridge Employment and Housing Evidence Update Employment Land, Economic Development and Relationship with Housing report • Restricting employment growth to historical trends fails to embrace the advancement technology brings. To do so in one of the most innovative clusters in world fails to meet Government's key priority of growing the economy. • The plan's employment target of 73,330 jobs to 2045 under-estimates historic growth and therefore the required industrial floor-space of 317,000 sqm is too low 	<p>Trust & Moss Family), 201967 (Shelford Investments), 202028 (Wimpole Associates), 202077 (J Francis), 202098 (Cambridgeshire County Council (Strategic Assets)), 202309 (CALA Group Ltd), 202364 (The CLC Trust), 202534 (Granta Land Ltd - Land West of Station Road, Meldreth), 202557 (Ely Diocesan Board of Finance), 202623 (British Land), 202648 (Granta Land Ltd - Land at Sheene Farm, Meldreth), 202663 (Granta Land Ltd - Land East of Station Road, Meldreth), 202747 (Martin Grant Land Limited), 203063 (Trinity College), 203075 (Granta Land Ltd - Land North of Mingle Lane and East of Hinton Way, Stapleford), 203147 (Christ's College), 203307 (J Manning), 203380 (Jesus College), 203404 (Jesus College), 203463 (Hopkins Homes), 203891 (Hill Residential (Fulbourn Site)), 203904 (Babraham Research Campus Ltd), 203912 (Abbey Properties Cambridgeshire Limited), 203921 (Emmanuel</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Concern that assumptions re larger household size and increased commuting, compared to previous assessment of need, are not sustainable; larger household sizes embed affordability issues not being able to move out of parents' home; increased commuting lacks sustainability. • There is an increasing disparity between the jobs target and the housing target. Greater Cambridge needs to plan for a corresponding increase in housing delivery, because anything else jeopardises the continued economic success of Cambridge and the delivery of the required housing in the right locations. • Using previous commuting assumptions will result in increased numbers of workers commuting into the area. • The approach to commuting assumptions is not justified. • The provision of affordable housing is considered to justify an increased housing figure, especially given recent delivery records • Affordable housing target is too low and does not reflect demand. On some strategic sites provision is reduced in favour of providing infrastructure. 	<p>College (Wilberforce Road), 203925 (Hill Residential (Sawston Site)), 204027 (E W Pepper Ltd), 204108 (Railpen), 204118 (Emmanuel College (Long Road)), 204120 (Richborough), 204136 (Hill Residential (Hardwick Site)), 204153 (Tritax Big Box Developments), 204204 (R2 Developments Ltd), 204234 (Bellway Strategic Land), 204323 (Barratt Redrow), 204353 (Hill Residential (Great Abington Site)), 204361], 204361 (Wain Estates), 204397, 204414 (Bellway Strategic Land), 204451 (Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204499 (Places for People), 204508 (Redrow South Midlands), 204536 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 204599 (SmithsonHill), 204634 (Urban & Civic and Hill Residential), 204797 (Quy Tech Ltd on behalf of landowners), 204831 (Pigeon), 204833, 210221 (Vistry Group), 204896 (St John's College Cambridge), 205000 (Endurance Estates), 205080 (Axis Land</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • The housing target is not consistent with national policy because upward adjustments for growth and affordable housing have not been considered. • Housing target should be adjusted upwards to take proposed infrastructure developments (e.g. EW rail, new busways and stations), economic growth ambitions and affordable housing needs into consideration; inadequate housing provision could be a barrier to growth. • Incorporate the additional growth ambition of the Cambridge Growth Company and Combined Authority • The proposed figures for job and housing needs should be regarded as minimums rather than maximums • Increase the housing delivery to a minimum of 61,000 new homes which is more akin with the likely housing needs given the planned employment growth. • Objects to plan expanding villages beyond the outer Green Belt, advocating for the inclusion of Gt Shelford sites to meet housing needs sustainably. • Critical of the lack of updated HELAA assessments for site 115766, which has constrained opportunities. 	<p>Partnerships Ltd), , 05140 (Home Builders Federation), 205240 (Cambridge Realty Limited), 205000 (Endurance Estates), 205080 (Axis Land Partnerships Ltd), 205084 (North Barton Road Landowners Group), 205140 (Home Builders Federation), 206216 (Granta Land Ltd - Land at Valley Farm, Meldreth), 207436, 207437, 207438 (Pioneer Group Ltd), 208326 (PX Land Ltd), 208397 (Ceres Property on behalf of land owner at Freisland Farm, Swavesey), 208700 (Guilden Morden Developments Ltd), 208770 (Croudace Homes), 201851 (Chivers Farms Limited), 208899, 208900 (Nightingale Land and Hill Residential Ltd), 209326 (B Homent, J Tee & R Smith), 208700 (Guilden Morden Developments Ltd), 209172 (Turnstone Real Estate Ltd), 204893 (Great Shelford, Ten Acres LLP), 204904 (St John's College Cambridge), 210312, 210313 (Russell Smith Farms), 211046 (Wates Developments (and Landowners)), 209032 (Marshall Group</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Concern regarding compliance with NPPF para 23, additional sites are needed to meet housing requirements by 2045 and to include a reliable buffer of at least 10% and revisit of the 'Exceptional Circumstances' case to ensure sustainable sites are not overlooked. • welcomes the commitment to updated Green Belt Study requesting publication before Regulation 19 consultation. • Concern Plan does not currently provide sufficient land to meet the housing requirement, allocate College land. 	Properties), 209033 (Marshall Group Properties), 211668 (SmithsonHill), 211679 (Newlands (Cambridge) Limited)
<p>Whilst the Local Plan identifies some level of need within the villages of the District, the current development strategy makes no attempt to meet this need. From a review of the Evidence Base, it appears no assessment of the level of affordable housing need has been made for the Villages of the District. Therefore, the Councils have failed to assess the level of both market and affordable housing need.</p>	209709, 209710, 209714, 209715, 206787 (Endurance Estates)
<p>Cambridge City and South Cambridgeshire administrative areas should be substantially higher number of homes delivery than the minimum of 71,586 dwellings between now and 2050 given its position role as the International Life-Science and employment driver for the County and the Government's Case for Cambridge.</p>	208384 (NIAB Trust)

Summary of issues raised in comments	Comments highlighting this issue
<p>The Plan allocates more housing than required to 2045. Even without Grange Farm, housing need would be met.</p>	<p>211715 (J Clifford)</p>
<p>Responder Objects to policy and requests the housing target is recalculated to include the previous commuting patterns adjustment, consistent with the adjustment made in the 2023 ‘Greater Cambridge Employment and Housing Evidence Update Employment Land, Economic Development and Relationship with Housing’ Report.</p> <p>Requests the housing target includes some upward adjustments for growth ambitions, reflecting the Greater Cambridge City Deal and the Cambridgeshire and Peterborough Devolution Deal, and the Cambridge Growth Company.</p>	<p>211607 (Bloor Homes Eastern)</p>
<p>Whilst it is understood why the 2021 census information is not considered robust as it was influenced by the COVID-19 pandemic, it is not robust to use “Census 2011 commuting assumptions applied up to the population supported by the standard method, and 1:1 commuting assumptions above this” as the basis for justifying the housing requirement.</p> <p>Previous commuting patterns are as a result of historic under-delivery of housing relative to jobs growth. Using previous commuting assumptions will</p>	<p>211102 (Hallam Land Management)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>result in increased numbers of workers commuting into the area. Whilst some will use public transport, this will inevitably result in an increased number of workers using Greater Cambridge's constrained road system. The proper planning of the area would see a greater housing requirement identified, which can readily access existing public transport and cycle links (the Guided Busway in this instance) and proposed new employment opportunities. The proposed (inadequate) identified housing requirement risks increasing strain on key infrastructure whilst also driving up property values due to a shortage of supply relative to demand. As evidenced within the Case for Cambridge report, it is already the case that economic growth in the region is being held back by a lack of adequate housing supply relative to demand, which is evident when considering that South Cambridgeshire has one of the highest house price-to-earnings ratios in the Country.</p>	
<p>Questions assumptions in the plan regarding job growth in Cambridge and impacts of AI on employment, suggesting a phased development approach based on specific criteria being met first</p>	205638 (A Brown)
<p>Responder objects misalignment of job target with the housing target requiring potential employees to commute into Greater Cambridge to fill jobs leading to increased in-commuting likely by car, if public transport</p>	211608 (Bloor Homes Eastern)

Summary of issues raised in comments	Comments highlighting this issue
<p>options are not available or the delivery of transport infrastructure projects are subject to unconfirmed funding decisions and associated development.</p>	
<p>Responder objects to the Report concluding no adjustments being required to the housing target for the draft GCLP to address affordable housing needs and requests housing target include some upward adjustment to address affordable housing needs.</p>	<p>211609 (Bloor Homes Eastern)</p>
<p>Responder objects to flaws in the methodological approach to quantifying the relationship between need for jobs and homes; not take account of the latest projections. The approach to HRRs is flawed and bakes in historic housing shortages in the areas.</p> <p>Failing to recognise increases in households associated with extra economic activity and household growth will worsen affordability pressures, and there is no uplift for affordability in the methodology that would have any material impact on the ability of those groups – such as younger people and other concealed households – to better access homes at a price consistent with their incomes.</p> <p>The Plan is not sound as the evidence is flawed and likely underestimates the number of homes necessary to meet the housing needs associated with</p>	<p>211662 (SmithsonHill)</p>

Summary of issues raised in comments	Comments highlighting this issue
increased levels of economic activity and overcome barriers to investment necessary to achieve it, contrary to NPPF paras 61, 63 and 85 and 86 (d)	
Objects as the strategy represents only 'baseline' economic growth that would be expected if housing delivery were in line with the standard method. The Plan is not currently sound because it is not consistent with national policy (specifically paras 85-86) as required by NPPF para 36(d).	211663 (SmithsonHill)
Objects a supporting text at para 2.10 of the draft Plan states "growth of around 4,000 additional jobs per annum" which is not reflective of the EHNU, which shows (Table 3.7) the 'central' scenario being associated with 3,490 jobs per year and is therefore not in accordance with the GCLP's own evidence (were it to be accepted on its own terms) and is misleading. The Plan is not currently sound because it does not reflect its own evidence, as required by NPPF para 36(b).	211664 (SmithsonHill)
Objects to Policy as lack of housing relative to demand is likely to contribute less housing affordability. Affecting business and public services recruiting and retain workers, increase demand for affordable housing. Businesses may choose to locate elsewhere, stifling economic growth in Cambridgeshire in this way would also certainly undermine wider regional and national economic growth prospects.	211667 (SmithsonHill)

Summary of issues raised in comments	Comments highlighting this issue
<p>Objects to housing initiatives which it could be reasonable to argue that housing supply does not have a net positive effect on the availability of housing for existing residents of Greater Cambridge. The Councils should consider the extent to which new housing delivery in the trajectory will serve different market needs. This should consider existing and future housing needs of different groups, as well as growth scenarios (both scheme specific and general).</p>	<p>211675 (SmithsonHill)</p>
<p>Objects to the Plan seeking to place a restriction on the size of a logistics Unit, even though supply and demand for storage and distribution floorspace is acute in Greater Cambridge.</p> <p>The Plan is contradictory to Paragraph 32 and Paragraph 87 of the NPPF, the latter stating that planning policies and decisions should recognise and address the specific locational requirements of different sectors.</p>	<p>211683 (Newlands (Cambridge) Limited)</p>
<p>Comments paragraph 2.72 of the Plan states that additional new industrial/logistics floorspace will be facilitated through longer term provision at Cambourne, and through incorporating some industrial/logistics floorspace within other, unspecified mixed-use employment allocations. However, existing permitted employment floorspace is not for B2/B8 floorspace planned to be delivered at Cambourne.</p>	<p>211678 (Newlands (Cambridge) Limited)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>It is not clear what use classes are proposed to be delivered at any sites referenced at para 2.72 or will deliver any of B2/B8 need that has been identified.</p> <p>Clarity is required through the policy allocations as to the anticipated uses each employment allocation will be seeking to deliver if the approach is to be effective in ensuring the employment needs are met.</p>	
<ul style="list-style-type: none"> • Concern Plan relies on larger schemes for development, and as such recommend: 15% should be the minimum buffer if North East Cambridge is not included, and the current growth assumptions are taken forward. Requiring an uplift of at least 4,096 homes not currently allocated; • 20% should be the minimum buffer if North East Cambridge is included, requiring an uplift of at least 2,445 currently unallocated homes. 	211672 (SmithsonHill)
<p>Comments it is important that GCSP consider whether economic factors suggest that population (and therefore housing) growth is even higher than the standard method indicates is needed, particularly in the context of NPPF paras 85-86.</p> <p>Noting ONS's population and household projections which post-date the</p>	211657 (SmithsonHill)

Summary of issues raised in comments	Comments highlighting this issue
<p>2021 Census; the 2022-based sub-national population and household projections. These projections also reflect more up-to-date assumptions nationally about levels of future long-term international migration; a key influence on demographic change in Greater Cambridge. It would be prudent for GCSP to consider these new data sets.</p>	
<p>Comments the ‘high’ scenario should be adopted, aligning with the scale of the Government’s ambition to 2050.</p>	
<p>Comments Stantec’s evidence states the local requirement for B8 is considered to be 609,230 sq m. The Policy plans for a shortfall of more than 270,000 sq m when assessed against Stantec’s assessment, which is considered to reflect the NPPF and PPG.</p>	211680 (Newlands (Cambridge) Limited)
<p>Comments states strategic need has not been planned for as there is no evidence of Greater Cambridge working with adjacent Authorities to deliver on the wider strategic need, and need of an economic sector (logistics) whose importance is emphasised at Paragraph 86(c) of the NPPF, has not been planned for.</p>	211681 (Newlands (Cambridge) Limited)
<p>Comments analysis of gross completions is considered to form a better indicator of actual demand, as the logistics market in Greater Cambridge experiences low vacancy levels, given the lack of supply.</p>	211682 (Newlands (Cambridge) Limited)

Summary of issues raised in comments	Comments highlighting this issue
<p>That 317,000 sqm floorspace figure underestimates the demand for industrial/warehousing floorspace in the region, and that additional land (comprising 609,760 sqm) should be allocated ensure that the logistics sector, mid-tech, manufacturing, and life sciences sectors can address local, regional and national demands.</p>	
<p>Concern the housing target is not consistent with national policy as upward adjustments for growth and affordable housing have not been considered. Notes the job target is not aligned with the housing target. A job target that is higher than the housing target requires potential employees to commute into Greater Cambridge to fill those jobs, leading to an increase in in-commuting to Greater Cambridge with most of the in-commuting would be by car, particularly if public transport options are not available or the delivery of transport infrastructure projects are subject to unconfirmed funding decisions and associated development.</p>	<p>211244 (Manor Oak Homes – Cottenham Site), 211252 (R Harvey)</p>
<p>Responder comments in the interests of ensuring Greater Cambridge exceeds expectations, this suggests greater weight should be given to the 'high' scenario in the EHNU as an aspirational yet realistic scenario and would a true 'step change' be a scenario associated with even higher housing and job growth.</p>	<p>211658 (SmithsonHill)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Responder comments that there is no evidence that aligning the number of homes to jobs in the way assumed by the evidence will have the impact on affordability necessary for those in the 25-44 age group currently unable to afford homes to access them. There is no evidence around the supply-price-affordability relationship to support the idea that the statistical relationship of homes will enable the needs of that particular group to be met by simply limiting the increase in supply to the specific number of additional households in that group. • Additionally, the premise of the standard method is to provide a level of housing over and above the assumed projection of households (i.e. demographic change) to improve - or at least moderate - the worsening affordability of housing. All else being equal – including housing supply and population change - affordability worsens when incomes increase. This means that in a growing economy, even if the number of homes matched the population growth linked to the number of jobs, affordability would worsen unless the supply of homes is increased further to a sufficient extent that it impacts on prices. Matching the number of homes to the number of additional households driven by economic 	<p>211659, 211660, 211661 (SmithsonHill)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>growth misses.</p> <p>GCSP's approach provides no material uplift to housing supply that might be expected to improve affordability; and is likely to create a deterioration in affordability for younger and lower income households, rather than an improvement, failing to meet need and in businesses struggling to recruit due to problems of affordability for workers.</p> <ul style="list-style-type: none"> • adjustment HRRs using assumptions from 2014-based projections and to go 'halfway' to the 2008-based projections are not meeting need <p>a That starting point from which projections look forward bakes in significant problems of affordability and a mismatch between homes and housing need in Greater Cambridge; even in 2012, Cambridge had an affordability ratio of 9.5 compared to 7.6 in East of England and 6.6 in England as a whole (Source: ONS)</p> <p>b There is no benchmarking of the 'as is' position in Greater Cambridge in terms of its relative position on affordability, concealed households, household formation and what this means about the level of housing required to meet needs and address the historic problems that exist.</p>	

Summary of issues raised in comments	Comments highlighting this issue
<p>c The adjustment to HRRs only goes 'halfway' to the 2008 figure. It does not explain why it does not go 'all the way'.</p>	
<p>Comments that the policy should treat the economic need figures as minimum requirements:</p> <ul style="list-style-type: none"> • Allow for appropriate flexibility and a level of choice for different sectors. • The job figure will likely need to evolve to align with the Government's broader growth agenda whilst ensuring the vision can be achieved sustainably. • Reflecting the need for additional jobs as indicated by the Greater Cambridge Employment and Housing Needs Update, which projects a need for between 67,600 and 90,900 additional jobs. • Historical growth trends show that the Greater Cambridge economy expanded by nearly 4,000 jobs annually during its strongest growth phase, suggesting a potential for sustained job creation. • Technological advancements in life sciences are transforming the sector, necessitating a flexible approach to employment growth that accommodates innovation rather than restricting it to historical trends. 	<p>204945 (Lolworth Developments Limited), 204462 (The Royal London Mutual Insurance Society Ltd), 204451 (Brookgate Land Ltd and Network Rail Infrastructure), 210220 (Vistry Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> concerned by the apparent dismissal of the higher growth scenario despite the study itself clearly accepting that this 'could be achieved or exceeded'. 	
<p>The Draft Local Plan's underlying evidence base underestimates the need for storage and distribution floorspace in Greater Cambridge, which is not aligned with the area's ambitious growth aspirations.</p>	205277 (Newlands (Cambridge) Limited)
<p>Comments regarding the approach taken to jobs and homes forecasts including the following:</p> <ul style="list-style-type: none"> Employment and housing growth assumptions lack robust, up-to-date evidence, especially the forecast of 73,300 additional jobs. Plan is working on outdated statistics of business needs, particularly labs The plan cites the Icen report but it doesn't mention 73,300 jobs Support for the use of local data to best inform the modelling of jobs and housing growth The Local Plan's approach to housing need is broadly welcomed, particularly its use of local data, headroom for growth, and commitment to a diverse mix of housing types and tenures, including affordable housing 	201178 (Save Honey Hill Group), 201326 (D Lott), 201499 (C Meads), 202428 (University of Cambridge), 203520 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
<p>Responder supports the increase in jobs being planned for in the Draft Local Plan to around 73,300 additional jobs and housing supply is increased to meet this need. Housing land identified in the Plan is insufficient.</p>	<p>211101 (Hallam Land Management)</p>
<p>The plan is centrally predicated on the creation of 73,000 jobs and the major strand of this is the so-called knowledge economy. The report on which it is based was written in 2022 so three years out of date.</p>	<p>207346 (K Rhodes)</p>
<p>Update the Plan to reflect the ambitions of the CPCA Local Growth Plan, including key growth sectors.</p> <p>Given the Local Growth Plan ambitions, rapid economic growth, transport improvements (including the collaborative work on the Greater Cambridge Transport Strategy), and government support through Cambridge Growth Company, the Plan needs to provide for at least its High scenario (59,409 homes).</p>	<p>205239 (Cambridgeshire and Peterborough Combined Authority)</p>
<p>Concern that additional sites are allocated within the Plan in order to address the shortfall of mid-tech floorspace within the current version.</p>	<p>211481 (Trinity College)</p>
<p>In order to enable the Plan to be responsive to changing market conditions and planned or new measures to alleviate infrastructure constraints it is</p>	<p>203906 (Cambridge Growth Company)</p>

Summary of issues raised in comments	Comments highlighting this issue
suggested that the policy wording allows flexibility for housing and employment growth beyond the Local Plan High Growth trajectory.	
<ul style="list-style-type: none"> • Statement of Common Ground does not make it clear how many houses will be built in neighbouring areas • unmet need for neighbouring authorities has not been taken into account to date. 	204268 (Croudace Homes), 205140 (Home Builders Federation)
Support for aligning housing figures with the government's standard method to avoid overburdening local infrastructure and resources, and potentially needing to seek assistance from neighbouring authorities to meet a portion of the enhanced housing figure.	201656 (Huntingdonshire DC)
West Suffolk council can confirm it is not seeking to accommodate any housing need identified in Greater Cambridge.	204914 (West Suffolk Council)
Recommends that to ensure that the emerging Local Plan is positively prepared and can be found sound, the Councils must work with Huntingdonshire and North Hertfordshire to ensure there is not an unmet housing need and to ensure that strategic cross-boundary matters are considered as part of the Local Plan.	209758 (Thakeham Homes Ltd)
Concern regarding the extent of the “need” for development in Greater Cambridge and if “need” is to assist the central government in meeting their targets so that they can demonstrate that they have met at least one of their	208713 (J and C Collins)

Summary of issues raised in comments	Comments highlighting this issue
<p>manifesto promises.</p> <p>If the effect of recent immigration levels is part of the need for development in the area and may be the drive by the successive governments in this regard.</p>	
<p>73,300 jobs projection is 'optimistic' rather than 'central' given the current economic outlook. The approach might be better framed as catering for an aggressive projection of future requirements to mitigate the risk of underdevelopment.</p>	201005 (M Colville)
<p>Concern the Plan does not currently provide sufficient land to meet the housing requirement</p>	211066 (Savills)
<p>Concern the Plan underestimates needs and additional sites are required to be allocated, and whether the Plan is "...prepared positively, in a way that is aspirational but deliverable" (NPPF Para 16).</p>	211422 (Gonville & Caius College)
<p>The forecast R&D office employment floorspace need is already met by supply.</p>	204637 (R Turnbull)
<p>Housing needs cannot be responsibly, realistically or sensibly articulated without parallel consideration of all of the necessary associated infrastructure.</p>	201581 (J Neal)

Summary of issues raised in comments	Comments highlighting this issue
Concern that new infrastructure may not be delivered in a timely manner given the speed of build out and to the extent that is required.	202120 (Elsworth PC)
The plan currently doesn't allow for enough housing for any increase in local employment and is not sufficient to serve the employment currently in the area.	205172 (L Gardner)
While some new jobs will be created by the development at Cambourne North, it remains to be seen how many go to local residents and whether they will include the mix that the Plan hopes for.	207097 (Elsworth PC)
As there is not enough housing or water for existing residents, that will create a need to supply more of both, which can't be done without exceeding climate targets set by law.	205214 (A Copping)
Increasing supply of housing stock should reduce house prices and make homes more affordable for people working in Cambridge, however the initiative risks being undermined without legislation to prevent the purchase of accommodation for short term letting.	201918 (A Davidson)
The vast majority of migration will be in the social care sector, relatively temporary and relatively low paid (though hopefully sensibly paid). The projections for population growth deliberately avoid the impact of Government Policy towards immigration and we know that all political parties' attitudes towards immigration control are hardening significantly.	207342 (K Rhodes)

Summary of issues raised in comments	Comments highlighting this issue
<p>The policy should stipulate “A minimum of 48,195 new homes meeting the needs of the total population of which at least 20 per cent must be social at a maximum of 60 per cent of market rents and a further 20 per cent affordable at a maximum of 80 per cent of market rents.”</p>	<p>208747 (Trumpington Residents Association)</p>
<p>The Local Plan must shift from a growth-led strategy to a resource-constrained model. This requires the plan to stop treating employment projections as inevitable targets and instead treat the region's environmental limits—specifically the depletion of the chalk aquifer—as the primary cap on development.</p>	<p>202732 (Cambridge Past, Present and Future)</p>
<p>Stronger rural proofing should ensure neighbourhood targets, specialist housing and job growth are aligned with rural transport, digital connectivity and community infrastructure capacity.</p>	<p>203143 (Cambridgeshire ACRE)</p>
<p>Objection to the policy’s prescriptive requirements on tenure for older person’s housing. Encourage the policy wording to be revisited to support the full range of specialist housing across all tenures, with proposals supported where they align with specific policies such as Policy H/SH. Suggest creating separate targets for housing for older people and housing for disabled people.</p>	<p>201944 (Anchor Hanover)</p>

Summary of issues raised in comments	Comments highlighting this issue
Concern specialist housing for older people will not all be delivered in the plan period, due to phasing and locations are located as part of wider/ larger proposals, delivery lacks certainty.	211261 (Terra Strategic)
1500 new nursing and residential care spaces is not enough for this ageing population and nothing for the needs of the pre-nursing stage elderly who live alone.	204522 (C Forbes-Cable)
Concerned that the figure for student accommodation need is misleading. More recent evidence is provided, which seeks to better reflect the plan period.	203985 (Anglia Ruskin University)
Concern regarding data inconsistencies between the housing requirement in S/JH of 2,295 dwellings per year and the housing need in Appendix D of approx. 1,600 homes. There is a discrepancy of 695 houses in these two data sets. If extrapolated across the plan period this would imply a potential discrepancy of 13,900 homes.	208714 (J and C Collins)
<p>Comments regarding the housing requirements for neighbourhood plans element of the policy, including:</p> <ul style="list-style-type: none"> • the Plan to use “indicative housing figure” for neighbourhood plans (not “requirement”) • correct the Eddington census anomaly that inflated Girton’s baseline 	202217 (Girton PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>If the policy is to retain a section setting out the housing requirement for neighbourhood areas, then an additional section should be added to include provision for housing in areas that are not neighbourhood plan areas. This could set out projected growth in other villages within the hierarchy and offer a greater structure to growth across the district.</p>	<p>204492 (Rosconn Group)</p>
<p>There is no mechanism to deliver the identified housing need for Stapleford and Great Shelford. Local evidence demonstrates an affordable housing need of 648 for this area. over the period 2023 – 2043.</p>	<p>208901, 208902 (Nightingale Land and Hill Residential Ltd)</p>
<p>Paragraph 3.43 of the Strategy Topic Paper explains this change by highlighting that Cambridge’s current commuting ratio is below 1, meaning there is a greater number of employees who are in commuting to the region. Whilst this is acknowledged, this fact is arguably a demonstration of historic under-delivery of housing relative to jobs growth, rather than a coherent justification for a continued lower housing requirement moving forward. In light of this, it is therefore disappointing that Greater Cambridge are content to pursue only the minimum housing requirements, effectively shifting residual housing demands into neighbouring authorities, which risks embedding unsustainable commuting patterns and increasing pressure on existing infrastructure in and around the City.</p>	<p>209716 (Endurance Estates)</p>
<p>See comments made previously on the Themes.</p>	<p>202340 (P Deer)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The Plan foresees 73,000 additional jobs in the area up to 2045, but only 50,000 new homes. This leaves a deficit of 23,000 homes. The planned deficit of 23,000 homes inevitably means that even more people who work in Cambridge and S Cambs will have to travel in from the hinterland, and a large majority of these people will travel by car, as they do now, making Cambridge and S Cambs' traffic problems and air quality even worse than they are now. The estimate of 73,000 new jobs may be an under-estimate because there is already 1 million square metres of additional employment space planned in the area by 2045, which I estimate could provide space for up to 83,000 new jobs. Plus the rise in homeworking since COVID means there will be jobs in excess of those located in formal, non-domestic employment space. Creating workspaces far in excess of the planned supply of housing will only exacerbate the housing shortage and further increase house prices and rents locally.</p>	<p>203277 (J Palmer)</p>
<p>Concerns the strategy proposed to meet the identified need is deliverable and about the location of new development, the majority to be delivered by new settlements to the north and west of Cambridge, ignoring growth in the villages east of Cambridge with access to the city and would benefit from services and facilities that will support Cambridge East.</p>	<p>211470 (Beechwood Estates Ltd), 211475 (G Robinson and Partners)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Comments provision made for 48,195 new homes across a range of tenures. Which is existing adopted supply (37,865 units), plus 13,463 additional units planned for under this plan meeting the need plus a 6.5% (3,133-unit) buffer (i.e. 51,328 units in total, comprising of existing, adopted sites and draft allocations under this draft plan).</p> <p>Suggests the distribution of development could be made more sustainable. Over-reliance on larger sites to come forward and be built out within the plan period. Requires a more proportional breakdown to allow for organic growth in suitable settlements to ensure that there are appropriate levels of development in these locations.</p> <p>Allocate more smaller and medium sites for development to ensure that delivery momentum can be sustained in the short term.</p>	208336 (Gladman Developments)
<p>Concern there is a question of soundness if the plan is not effective in delivering housing (NPPF 2024 paragraph 36) due to increase in requirements of new standard method and this must be addressed.</p>	208362 (Endurance Estates)
<p>Respondent argues the Standard Method figures correlates with the job and housing projections, that adoption of these figures is appropriate. However, in accordance with the requirements of the NPPF this is not considered to be an appropriate strategy accounting for reasonable alternatives and other</p>	208376 (NIAB Trust)

Summary of issues raised in comments	Comments highlighting this issue
<p>publicly available evidence. Suggests Policy S/JH is not justified and the DLP should not be considered sound and to revise the development strategy to align with the higher growth scenarios for Greater Cambridge.</p>	
<p>Responder requests clarification of data source used to determine housing units and bed spaces cited in the Paragraph 3c of Policy S/JH. Queries cross-referencing with County Council's demand profile? States their data, the projected need for residential and nursing beds for individuals aged 18–64 within Cambridge City and South Cambridgeshire is approximately 12 beds by 2041, appears to differ from the figures presented. States the difference is significant and recommend that the these are reviewed and confirmed before being published due to the risk of a) oversupply b) inappropriate type of supply of housing being developed as a result.</p>	210542 (Cambridgeshire County Council)
<p>Comments Paragraph 36 a) of the NPPF is clear that to be positively prepared, the Local Plan should, as a minimum, seek to meet the areas objectively assessed housing needs. This is the minimum level of growth that should be planned for and clearly is not in line with the growth ambitions set out at the national level or in the Local Growth Plan. The level of growth should be higher than the minimum level of growth as proposed using the Central level of growth or standard method housing and job figures.</p>	208378 (NIAB Trust)

Summary of issues raised in comments	Comments highlighting this issue
<p>Responder states national policy is clear that meeting an area’s objectively assessed needs should only be a minimum (i.e. Paragraphs 11b, 36a & 62 of the existing Framework and Policy PM2 1.b, Policy S1 1.a, and Policy PM14 2.a of the emerging Framework) and that Plans should be prepared positively. Additional housing should be considered and can be achieved through the Government’s railway station policy the Plan strategy and the infrastructure implications associated with unlocking this growth should be factored in and reflected.</p>	<p>211072 (Ashwell & Morden Landowner Consortium)</p>
<p>Responder states Plan currently covers a plan period to 2045. The provision for 48,132 dwellings proposed over that period, therefore will deliver less than 50% of the government’s lower aspiration of delivering 100,000 dwellings in the Greater Cambridge Area by 2050 or less than 33% of the housing required using the higher figure of 150,000 dwellings. Based on this, it is considered that the levels of job and housing growth targeted are not justified and are not an appropriate strategy taking into account the reasonable alternatives. Policy S/JH is considered unsound and requires amendment.</p> <p>Increase the level of forecast jobs and homes to be delivered the Plan to ensure alignment with the Government’s planned growth for Greater Cambridge.</p>	<p>208379 (NIAB Trust)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Responder recommends allocation of additional small and medium development sites to provide greater flexibility and help mitigate against slow or non-delivery of strategic sites to enable delivery of necessary homes and jobs, and redress the current fall in housing land supply, as recognised at NPPF paragraph 73.</p>	<p>208386 (NIAB Trust)</p>
<p>Responder states a justification for adopting a higher growth scenario in the Plan to meet the government’s growth targets, achieved through the allocation of further sites on locations where changes to the NPPF make it inevitable that they will otherwise come forward as speculative applications.</p>	<p>211471 (Beechwood Estates Ltd), 211476 (G Robinson and Partners)</p>
<p>Planning for growth in workspaces that races far ahead of the planning increase in housing supply does not support the stated environmental and transport aspirations, and in fact it makes it impossible to achieve them. Indeed, further growth in workspaces in the countryside, away from housing and train links, pushes in precisely the opposite direction. Rather than the current emphasis in the Local Plan on building as many new dwellings as possible, there should be more emphasis on limiting the number of new workspaces – so new homes have the intended effect of making homes more affordable, especially for young people.</p>	<p>203279 (J Palmer)</p>
<p>The Plan’s commitment to accommodating employment growth and supporting the clustered nature of the Cambridge innovation economy is</p>	<p>208932 (Cambridge Growth Company)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>supported. CGC acknowledges that the draft Plan's employment growth projections are based on a 'central scenario' and are reflective of identified constraints. However, we would like the draft Plan to be clear that subject to resolution of those constraints, employment growth exceeding the Local Plan central scenario could be delivered within the Plan period and that policy wording should include sufficient flexibility to accommodate higher and accelerated levels of growth prior to 2045.</p>	
<p>CGC would like to see the Plan more explicitly recognise the value of intensifying and expanding the identified innovation clusters to fully realise growth potential and agglomeration benefits. Enabling an intensification /densification of cluster sites should where appropriate incorporate an element of housing, including innovative housing typologies, to help support their function. CGC also welcomes the draft Plan's support for a diverse range of commercial space to accommodate different stages of business and employment growth. CGC also supports the draft Plan's approach to meanwhile uses, circular economy principles and low-carbon development.</p>	208933 (Cambridge Growth Company)
<p>Regarding para 2.10 of the Draft GCLP central case as the 4,000 additional jobs per annum is not consistent with the EHNU 2025.</p> <p>The proposed industrial need requirement of 317,000sqm set out in paragraph 2.12 is considered to be an under-estimate of the overall</p>	209173 (Turnstone Real Estate Limited)

Summary of issues raised in comments	Comments highlighting this issue
<p>requirement if market signals are appropriately applied, particularly in respect of existing floorspace that will be displaced by mixed use allocations, the significant scale of aging industrial stock that may be lost/redeveloped, and the scale of suppressed demand.</p> <p>Responder recommends the policy and evidence base should be updated, including having regard to the revised additional job number as described.</p>	
<p>Recommend Councils consider the 'high' job growth scenario of c.4,300 jobs per year – if not even higher and the associated level of housing provision.</p>	209694 (CEG Land Promotions Ltd)
<p>The Plan's focus on delivering a diverse mix of housing types and tenures, including affordable housing, is supported as is recognition of models such as build-to-rent, Community Land Trusts, co-living and employer-led housing. Achieving a greater diversity of housing than historically delivered by the market should be a clear objective of the Plan and as appropriate made explicit for site allocations.</p>	208934 (Cambridge Growth Company)
<p>The plan provides for an additional 73,300 jobs over 21 years, a growth rate of 1.3% pa. The 73K additional jobs is consistent with the additional jobs supported by the standard method of assessing housing need, based on population growth and affordability uplift, adding in workers who commute into Greater Cambridge. However, the analysis uses 2011 levels of in-</p>	208935 (Cambridge Growth Company)

Summary of issues raised in comments	Comments highlighting this issue
<p>commuting, the most recent comprehensive data, so it is very likely to be undercounting current levels of in-commuting and therefore undercounting the jobs that would be supported by the standard method. However, it is acknowledged that there are no more up to date published data sources to evidence.</p>	
<p>The supporting Icen Employment and Housing Needs Update acknowledges that the high growth scenario could be achieved or exceeded. For this to take place a step change in infrastructure investment and development would be needed to facilitate growth, notably in transport to connect in and move labour, as well as in wider services infrastructure and the expansion of both housing and commercial development programmes. In order to enable the Plan to be responsive to changing market conditions and planned or new measures to alleviate infrastructure constraints it is suggested that the policy wording allows for housing growth beyond the Local Plan High Growth trajectory.</p>	<p>208936 (Cambridge Growth Company)</p>
<p>Comments dependent on allocations that have not come forward from the adopted plans. No confidence in those sites, adopted in the 2018 Local Plans, will now come forward if there has been no movement on them since adoption.</p>	<p>208331 (Gladman Developments)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The respondent objects to Policy S/JH, stating it should be considered alongside Policy S/DS, which they also oppose, as both policies are interconnected and impact future growth in Greater Cambridge.</p> <p>While supporting the objective of meeting housing needs, the respondent criticises the reliance on large sites for housing delivery, arguing it will hinder the necessary increase in housing supply.</p> <p>The respondent believes the draft plan's focus on Neighbourhood Plans is insufficient and limits growth opportunities, recommending more direct allocation of smaller and medium-sized sites.</p> <p>The respondent urges a review of the Housing and Employment Land Availability Assessment to identify deliverable sites near sustainable settlements to support local growth.</p> <p>They reference a report indicating that affordable housing is crucial for attracting skilled workers and supporting productivity growth in industrial clusters.</p>	<p>204492 (Rosconn Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The respondent notes that Greater Cambridge has a significant affordable housing shortage, with demand outpacing supply, particularly for a diverse range of job roles.</p> <p>They argue that the proposed Grange Farm New Settlement will not address immediate housing needs, as it will take several years to deliver homes.</p> <p>The respondent suggests that their client's site at Land North of Pampisford Road is suitable for allocation, being a medium-sized greenfield site that can quickly contribute to housing supply.</p> <p>They conclude that Policy S/JH is unjustified and ineffective, stating it will delay housing delivery and does not align with the requirements of the NPPF.</p>	
<p>ECC acknowledges that “Greater Cambridge economy is nationally and internationally important”. For the Plan to be effective it is important that in developing the employment strategy there is acknowledgement of the cross boundary and strategic matters that must also be clearly articulated. In particular for the economy, as previously highlighted within the ECC</p>	<p>210474 (Essex County Council)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>response, the emerging Greater Cambridge Local Plan must acknowledge and appreciate the opportunity provided for international connectivity by London Stansted airport. Given the international significance of the employment clusters, and for the Local Plan to be effective it must have an appreciation of the proximity to London Stansted airport, and also seeking to ensure that surface accessibility to improve connectivity with Greater Cambridge is fully explored when developing the emerging Plan.</p>	
<p>The latest Plan confirms previous assessments of jobs and housing needs, but it does not reflect the reality that many new jobs in Cambridge and S Cambs are in biotech and IT fields, which are notoriously prone to downturns and uncertainty. It is not possible to predict accurately how many jobs and workplaces there will be in Cambridge and S Cambs in 20 years. Arguably, it would be better to focus on five-year time horizons, when forecasts of jobs, workplaces and housing needs are more reliable.</p>	203291 (J Palmer)
<p>Terra supports the provision of a minimum of 48,195 new homes in the period up to 2045 to meet the objectively assessed needs in Greater Cambridgeshire.</p> <p>It is noted that the current supply is cited as 37,865 with a requirement for 10,330 additional new homes to be identified as new allocations to meet the housing need.</p>	211217 (Terra Strategic)

Summary of issues raised in comments	Comments highlighting this issue
<p>Land at Oakington Road, Cottenham is sustainably located adjacent to the Development Extents of Cottenham and constitutes an appropriate medium size site for housing to come forward.</p>	
<p>LSH supports the requirement of providing a minimum of 48,195 homes over the Greater Cambridgeshire area. The Housing Needs of Specific Groups in Cambridge and South Cambridgeshire Report (August 2025) concluded that there was an annual need in Greater Cambridge for 2,309 dwellings, with paragraph 7.159 stating that there is an acute need for affordable housing in both local authorities (Cambridge City and South Cambridgeshire) and that it is clear that the provision of new affordable housing is an important and pressing issue in the area (para. 7.169).</p>	211230 (Living Space Housing)
<p>Concern for provision of specialist housing accommodation as housing needs of specific groups are accounted for within the overall housing requirement of 48,195 dwellings, the proposed housing requirement falls short of the Government’s standard method requirement, the calculation of which does not evidence how it has included consideration of the housing needs of specific groups.</p> <p>There is no Housing and Economic Needs Assessment such that no evidence is provided identify how the housing needs of specific groups have</p>	211274, 211275 (Woolsington One Ltd)

Summary of issues raised in comments	Comments highlighting this issue
been calculated, or the implication of this on the overall housing requirement for the Plan.	
Responder states minimal buffer for housing land supply across the plan period creates an unnecessary risk that Greater Cambridge will fall below the 5 years needed. The way to resolve this would be to include a greater number of short-medium sized sites.	210711 (Gladman Developments)
The Plan states land identified within New Sites totals 13,463, a substantial proportion of which comprises of large strategic allocations typically having greater infrastructure requirements unlike smaller sites that can be delivered more expediently.	211600 (LGH Hotels Management Limited)
Concern does the Plan period meets the NPPF requirement (set out at para. 22) for strategic policies to look ahead over a minimum 15 year period from adoption, and for policies to be set within a vision that looks ahead at least 30 years, where larger scale developments such as new settlements and significant urban extensions are proposed.	211038, 211051 (Wates Developments)
Concern the supporting text of the Plan acknowledges the need for flexibility to allow for potential achievement of higher job growth, but this has not been reflected in the wording of Policy S/JH itself. As such there is a potential risk of restricting job growth and failing to meet the economic objective of sustainable development included in the NPPF (para 8a).	211039, 211052 (Wates Developments)

Summary of issues raised in comments	Comments highlighting this issue
<p>Concern strategy relies heavily on Northstowe to deliver homes. Must be matched by infrastructure delivery mechanisms for public transport upgrades, social and civic facilities, and timely delivery of healthcare facilities as assured by S106 planning obligations. Failure to deliver these in line with obligations jeopardises Northstowe’s sustainability and ability to support future housing growth. Master developer must pursue a strategy leading to timely, visible, and quality infrastructure delivery, in conjunction with quality, affordable and desirable homes, improving delivery rates.</p>	<p>208074 (Northstowe Town Council)</p>
<p>Comments that the Plan only meets the minimal “objectively assessed need” leaves no headroom for the extra growth Government and industry partners are actively seeking to stimulate.</p> <p>A conservative outlook means the Plan could fall short of the Government’s and Combined Authority’s ambitions. If growth even partly approaches the higher national expectations, the planned employment land and floorspace would be insufficient to support it.</p>	<p>211487 (Trinity College)</p>
<p>Concern Policy S/JH identifies objectively assessed needs over the plan period for 73,300 additional jobs to support knowledge intensive sectors and provide a diverse range of local jobs. The Greater Cambridge Employment and Housing Evidence Update 2025, this figure equates to</p>	<p>211513 (Trinity College)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>317,000sqm of industrial and warehousing floorspace (Use Class B2/B8). Within the draft plan is only a supply of 29,000sqm demonstrating a significant shortfall of approximately 288,000sqm across the plan period.</p>	
<p>Land at Kingsfields (land north and south of A428) is well positioned to support the objectives of Policy S/JH and the wider spatial strategy of the Local Plan. Its relationship with the proposed EWR corridor represents a rare opportunity to align employment growth with nationally significant infrastructure investment, consistent with national policy objectives to support sustainable economic growth, productivity and modal shift. This representation is further supported by a Transport Written Representation prepared by Pell Frischmann, which demonstrates the suitability and deliverability of transport connections between the Land North of the A428 and Cambourne North and the central Cambourne. It is also reiterated that the employment land is capable of delivery in parallel with the A428 improvements and EWR proposals.</p>	<p>208277 (The Church Commissioners for England)</p>
<p>Responder comments the allocation Land north of A1307, Bar Hill (Slate Hall Farm) includes approximately 220,000 sqm of employment floorspace. The Council's decision to allocate this site for development misses an opportunity to allocate housing land for development at Bar Hill to provide homes in close proximity to major centre of employment.</p>	<p>211597 (LGH Hotels Management Limited)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Land at Denny End Road, Waterbeach (HELAA Site: 56211)</p> <p>Responder states the Plan does not currently provide sufficient land to meet the housing requirement due to the continuing reliance on in-commuting; and strategic sites. Suggests the allocation of Land at Denny End Road, Waterbeach.</p>	<p>204927 (Savills)</p>
<p>Responder states that Forest City is a proposal to deliver 400,000 new affordable homes. Delivered through a development corporation model combined with a community land trust structure, enabling housing affordability and employment. Forest City is unlikely to be accommodated within the Local Plan at this stage, given its need to further develop its evidence base, however, we would hope that GCSP would not oppose the proposal.</p>	<p>208129 (Albion City Development Corporation Ltd)</p>
<p>Land West of London Road, Fowlmere</p> <p>Responder requests flexibility to support higher jobs growth to be incorporated in the Plan. To provide appropriate flexibility for unforeseen economic growth, a range of additional contingency site allocations should be included within the housing trajectory. Ensuring the Plan is positively prepared, justified and effective in accordance with the NPPF tests of soundness. This site offers a sustainable location for development and is</p>	<p>211040, 211053 (Wates Developments)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>immediately available, contributing to the Councils' short to medium housing delivery rates.</p>	
<p>The Local Plan supporting text also confirms that the Neighbourhood Plan areas can choose to meet or exceed the housing requirement but that the delivery of allocations already included in the GCLP cannot be used to meet the housing requirement of a neighbourhood area.</p> <p>The Stapleford and Great Shelford Neighbourhood Plan covering the area does not include any allocations/ the level of anticipated growth (c.134 net new homes) is considered to significantly underplay the role of the villages and the potential these highly sustainable settlements can play towards delivering the Vision for Greater Cambridge.</p>	<p>209971 (Granta Land Ltd)</p>

Policy S/DS: Development strategy

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Broad support for the development strategy concentrating jobs and homes within urban centres, new settlements or in close proximity to proposed infrastructure, as the most sustainable locations helping to reduce the need to travel, promoting public and active travel, and have the least climate impact. Comment from Natural England and Anglian Water that the development strategy principles align with their strategic priorities and long-term ambitions.

Comment that the plan should align with the Cambridgeshire and Peterborough Spatial Development Strategy, including suggestion the plan period should be extended to 2050.

Objection that the strategy is too conservative in identifying insufficient jobs and homes for sustainable growth in Cambridge, does not align with the Government's growth agenda, and that the housing requirement does not align with jobs growth. Comment that the Plan does not provide enough housing land to meet the needs. Objection that the Plan is not meeting the need for specific sectors including large scale warehousing, mid-tech, agri-tech, and data centres.

Concern that the development strategy is locating housing away from employment sites with negative consequences, including increased pressure on transport corridors, with the suggestion that employment and housing must be planned together in mixed-use development to reduce the need for costly public transport extensions.

Objections that the strategy places an overreliance on a few large strategic sites for growth, which require uncertain new infrastructure, often without funding or consent, that risks delivery, that is contrary to the NPPF requirements for a proportion of homes on smaller sites and for enhancing rural community vitality, with the suggestion that there is justification for release of land from Green Belt, that a 20% headroom is included and that additional smaller sites should be allocated to ensure delivery early in the plan period and support small/medium housebuilders to enhance housing diversity and foster local growth. Comments that the housing trajectory is based on over simplistic delivery rates and is not credible, with historical data demonstrating slower delivery from strategic sites. Comments suggesting a diversified strategy with proportionate growth on the edge of Cambridge, in expanded existing settlements and development along transport corridors, with various sites promoted. Comments raising concerns with the scale, delivery and impacts of strategic sites including Grange Farm, Cambourne North, Cambridge East. Comments raising concerns with the anticipated delivery from windfalls, including the windfall allowance, and that the Local Plan is dependent on allocations that have not come forward in the adopted Local Plans.

Comments in support of not removing additional land from the Green Belt as it is unnecessary to meet development needs. Concern with the policy approach that development needs alone do not justify Green Belt release, that the strategy was determined ahead of the Green and Grey Belt review, and that updated evidence is needed including a review of grey belt. Suggestion that there should be targeted review of the inner Green Belt to take a holistic approach to sustainable development.

Concerns around adequate water supply and the lack of infrastructure to support the proposed development, including that the required infrastructure may not be deliverable through the development process alone. Concern that there is a lack of clarity over the timescales for delivery of strategic transport infrastructure, the need for sustainable transport alternatives to the private car including in the rural area, and raising concerns about the impacts of specific transport schemes such as Cambourne Station, East West Rail and CSETS. Comment that the Plan cannot be properly considered without the Greater Cambridge Transport Strategy.

Concerns that the provision of Gypsy and Traveller pitches within strategic allocations, regularisation of existing sites, household dissolution and enforcement action is likely to result in over-provision within the plan period. Additionally, concerns that the Local Plan does not include a roadmap or commitment to delivery within strategic sites, and that the burden is placed on optimisation and intensification of existing sites particularly through S/AMC/GT. Concerns that Smithy Fen is already out of proportion with the proposed number of pitches considered appropriate for new communities, and that adopted planning policies H/21 and H/22 have not been carried forwards.

Response to main issues raised in representations:

Support for the development strategy is noted.

This version of the plan is being produced ahead of the Spatial Development Strategy so cannot be informed by it. The plan period of 2024-2045 is in excess of the 15 years required by national planning policy, and is considered an appropriate time horizon to plan for, balancing providing certainty for the long term with the difficulty of forecasting development and other needs far into the future.

For both employment floorspace and housing the plan includes a flexible supply that provides headroom above the identified objectively needs, as set out in below, with further detail provided in the Strategy Topic Paper.

Anticipated supply from completions in 2024/25, existing commitments, the windfall allowance and new allocations is in excess of the housing requirement of 48,069 dwellings for 2024-2045 set out in the Local Plan. A headroom of 8.2% is provided. There are also a number of strategic sites that will continue delivering beyond the plan period. The Housing Delivery Study – Addendum (2026) sets out that there is no national planning policy requirement for headroom to be included over the plan period, but it is sensible to do so to provide resilience. It also highlights that with the requirement to review local plans every 5 years, a plan review can address any shortfall later in the plan period if it arises, and that Greater Cambridge has more organisations supporting the delivery of housing and infrastructure delivery tools at its disposal than the majority of local planning authorities across the country. The Cambridge Growth Company's explicitly stated role is to enable and accelerate key developments in and around Cambridge. As such this area will have the tools to accelerate housing delivery beyond the rates included within the housing trajectory, which would again add to the housing supply within the plan period. The headroom of 8.2% is therefore considered to be appropriate for Greater Cambridge.

Comments that the development strategy locates housing away from employment sites with negative environmental consequences have been considered. The development strategy directs development to the most sustainable locations to reduce commuting over long distances and enable travel by sustainable modes, whilst having regard to Green Belt purposes. The strategy focuses on strategic sites that have existing or proposed public and active travel connections to Cambridge and other key employment locations. The strategy includes significant mixed use development within and on the edge of Cambridge outside of the Green Belt

close to employment centres, in particular at Cambridge East, and also includes housing development close to employment locations away from Cambridge, including at Land adjacent to A11 and A1307 at Grange Farm.

The Councils have considered comments that the Plan is not meeting the need for specific sectors including large scale warehousing, mid-tech, agri-tech, and data centres. For large scale warehousing, the Council's evidence identifies a robust need for warehousing meeting Cambridge market needs. It would not be appropriate for the Greater Cambridge Local Plan to identify and apportion a need for strategic warehousing facilities serving national or regional markets that include but go beyond Greater Cambridge. The future Cambridgeshire and Peterborough Spatial Development Strategy (SDS) provides a credible prospect that a long term solution to the need for warehousing and logistics serving national or regional markets affecting Greater Cambridge and the wider Cambridgeshire and Peterborough area will be identified in the foreseeable future. Ahead of the SDS, emerging local plans in the area provide a positive approach in responding to evidenced needs for warehousing and logistics, including for warehousing and logistics serving national or regional markets where a need has been identified. Noting significant supply in the wider area and that the sub-regional and regional need is not confirmed, Cambridge City Council and South Cambridgeshire District Council consider that there is no case for immediately allocating additional supply in the emerging Greater Cambridge Local Plan that would address warehousing and logistics needs serving national or regional markets. For mid-tech, the Councils' Industrial and Warehousing Study 2024 explored this topic including engaging with mid-tech occupiers, identifying mixed views. The Proposed Submission Plan includes sufficient allocations in priority locations that meet the need identified in that Study. For agri-tech, whilst there are Agri-Tech strengths across the wider region, the concentration is less distinctive in Greater Cambridge and clustering is less apparent compared to other sectors. The Councils' evidence does not identify a need for an additional site in Greater Cambridge to enable the clustering of AgriTech businesses. For data centres, while the Councils' evidence does not explore this issue explicitly, very few representations have raised the need for this emerging use. The Councils consider that the

very significant amount of employment floorspace included in the Plan would provide opportunities for such uses to come forward in desired locations.

In response to objections that the strategy places an overreliance on a few large strategic sites for growth, the development strategy focuses on the most sustainable locations to create vibrant, self-sustaining communities with a range of facilities and services, supported by planned high-quality public transport, and delivering homes to meet the needs of a variety of groups. The strategy promotes effective use of brownfield land including development at Cambridge East on the edge of Cambridge, released by the vacation of the airport, as well as at consented new settlements that include significant brownfield land at Northstowe, Waterbeach and Bourn Airfield. Consented sites such as these are included in the strategy and will continue to build out during the plan period. The strategy also provides flexibility by directing development to a range of locations, including smaller village sites, to meet local needs and ensure a consistent supply of housing delivery.

In terms of the deliverability of the strategic sites included within the Plan, the Infrastructure Delivery Plan identifies the infrastructure requirements relevant to each of these, including identifying funding and delivery timings. The Housing Delivery Study – Addendum (2026) considered the certainty and timing regarding the key infrastructure that each strategic site relies upon, to inform its conclusion that the trajectory for each site and the trajectory as a whole is deliverable.

The Councils recognise that the proposed strategic allocations will have significant impacts. Equally, alternatives to the proposed strategy, for example dispersing development to South Cambridgeshire villages, has been evidenced to have transport impacts that could not be mitigated. The impacts for each site have been carefully considered through evidence and via engagement with relevant organisations, for example via the further exploration of transport, ecology and landscape impacts associated with Cambourne North. Drawing on this evidence, the Infrastructure Delivery Plan sets out for each strategic scale site the infrastructure

required to mitigate the impacts of development, and the allocation policies each include firm requirements to ensure that all impacts of development are addressed.

The Councils have carefully considered the approach to Green Belt in this Plan. Drawing on our evidence and consultation feedback, we do not consider that our development needs alone provide the 'exceptional circumstances' required in national policy to justify removing land from the Green Belt in this Local Plan, having regard to the identification of other sources of land supply that can meet needs sustainably without the need for Green Belt release. We have, however, identified site specific exceptional circumstances for releasing land from the Green Belt at the Cambridge Biomedical Campus and Babraham Research Campus. Whilst we do not consider it necessary to release Green Belt to meet the general development needs identified in this plan, we have updated our Green Belt study in accordance with the latest National Planning Policy Framework and Planning Practice Guidance to ensure it provides a robust assessment, including to identify grey belt land within Greater Cambridge.

The Councils recognise the significance of the water supply challenge in Greater Cambridge, and have explored this topic in depth with all relevant national and local partners. As part of the Proposed Submission documentation, a Statement of Common Ground regarding water supply has been agreed between these partners, confirming that, whilst water supply issues will need to continue to be carefully monitored, the Local Plan has appropriately considered water supply issues. There will be statutory water supply planning by way of the Cambridge Water's WRMP29 which will consider water supply planning over a minimum 25 year horizon, including taking into account the Local Plan. Water Resources East will also be producing an updated Regional Water Plan. Subject to appropriate infrastructure planning and associated approvals, funding and delivery through these processes, water supply is not a barrier to delivering the level of development proposed in the Proposed Submission Local Plan.

Comments on transport have been considered. Transport evidence supporting the Proposed Submission Plan demonstrates that

the transport network can accommodate the sites included in the development strategy subject to the provision of appropriate mitigation. This mitigation is set out in the Infrastructure Delivery Plan. In addition, the draft interim Greater Cambridge Transport Strategy sets out proposed solutions to address the connectivity needs of Cambridge City Centre, and also all other strategic transport schemes required to deliver the strategic sites identified in the Local Plan development strategy. As such, the draft interim GCTS provides sufficient proportionate evidence at this Regulation 19 stage to support the delivery of the sites within the strategy. The CPCA is committed to approving a final GCTS in November 2026 to support the submission of the Local Plan for examination in December 2026.

A response to the representations received relating to the delivery of specific sites, including their lead-in times and build out rates, and relationship with the delivery of infrastructure is set out in the response to representations on Appendix D (previously Appendix E). The Housing Delivery Study for Greater Cambridge – Addendum (2026) sets out AECOM's recommendations for responding to the representations relating to housing delivery, including the windfall allowance, and it also sets out AECOM's review of the housing trajectory for the Local Plan, including considering the Councils' housing trajectories for the new allocations and the overall deliverability of the development strategy. Appendix 10 of the Development Strategy Topic Paper (2026) sets out how the Proposed Submission Local Plan housing trajectory has been created, the Councils' assumptions for the deliverability and developability of each new allocation, and detailed annual trajectories for each of the new allocations. The Housing Delivery Study – Addendum (2026) concludes that the Proposed Submission Local Plan housing trajectory is deliverable, and that there is a balanced mix of viable sites that can deliver across the plan period.

Actual completions and allocations are anticipated to deliver a significant proportion (just over 87%) of the housing requirement of 48,069 dwellings, with the remainder (just under 13%) anticipated to be delivered by windfall sites. There is a history of windfall delivery in both Cambridge and South Cambridgeshire and the policies in the new Local Plan do not seek to limit the delivery of

windfall sites compared to current or previous policies, therefore it is considered realistic that new homes will continue to be delivered on windfall sites. The Housing Delivery Study – Addendum (2026) confirms that the recommendations in the Housing Delivery Study (2021 and 2025) for the windfall allowance are realistic and reliable for use in plan-making in the Greater Cambridge area.

The Councils have considered each of the adopted allocations from the Cambridge and South Cambridgeshire Local Plans 2018 in light of paragraph 127 of the NPPF 2024, and the results of this assessment are included in Appendix 3 of the Development Strategy Topic Paper (2026). The Councils' overall conclusions on which sites should be allocated in the Proposed Submission Greater Cambridge Local Plan, taking account of all other evidence, are set out in Appendix 8: Review of sites to inform identification of allocations at Proposed Submission stage.

The Councils consider that completions in 2024/25, existing commitments, proposed new allocations, and the windfall allowance have a good prospect of delivering the objectives of paragraph 73a of the NPPF 2024, which sets out that at least 10% of the housing requirement should be on sites no larger than one hectare. An alternative approach of allocating specific sites to demonstrate compliance would require identifying large numbers of small sites in the rural area, that would otherwise be enabled to come forward anyway via the other policies in the plan, including for example Policy S/SH, and as assumed in our windfall allowance. This would significantly add to the plan making process and compromise the aims and principles of our development strategy, by directing a significant portion of growth to less sustainable locations where levels of car use would be higher, impacting on our response to the challenges of net zero carbon and Climate Act obligations. It would also likely result collectively in requiring large amounts of land to be released from the Green Belt as the majority of the larger and better served villages are located within the Green Belt. Information on the likely supply of homes on sites of 1 hectare or less is set out in Appendix 2 of the Development Strategy Topic Paper (2026).

The [Accommodation Needs Assessment of Gypsies, Travellers and Travelling Showpeople](#) (ANA, 2025) makes recommendations for meeting the needs of Gypsies and Travellers in Greater Cambridge, including through turnover on existing sites, regularising of sites that are not permanently authorised, additional pitch provision using existing sites, making pitches on existing sites available, sites becoming vacant through household dissolution, and new sites for permanent pitches identified either as standalone sites or associated with major development sites. Each of the recommendations included in the ANA in terms of potential sources of supply to meet the identified needs of Gypsies and Travellers have been considered by the Councils, and the results are set out in Appendix 11 of the Development Strategy Topic Paper (2026). Although it is anticipated that around 185 pitches will be delivered within the plan period, this is based on assumptions relating to: household dissolution, pitches being made available where they are currently occupied by non-travellers, and strategic sites delivering new sites within the plan period. It is important that there is flexibility within the supply to enable sites to be brought forward at the appropriate time to meet identified needs.

Amendments have been made to Policy H/GT to clarify the principles for the development of traveller sites within strategic sites, including in relation to their location within the site and their delivery. Policies H/21 and H/22 from the adopted South Cambridgeshire Local Plan have been carried forwards into Policy H/GT. Policy S/AMC/GT is intended to set out the principles for proposals relating to the reconfiguration of sites to ensure that they result in an improvement in health, safety and living conditions for Gypsy and Travellers. Within South Cambridgeshire, there are existing concentrations of Gypsy and Traveller sites within specific parishes. For each of these parishes, Gypsy and Traveller pitches make up 1.1% to 2.6% of the 'dwellings'. Whereas, for strategic sites, the number of pitches would amount to between 0.24% and 1.2% of the 'dwellings' on the site.

Overarching

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for Development Strategy includes:</p> <ul style="list-style-type: none"> • Broad support for the 7 strategic priorities. • excellent proposals and detailed intentions that are well communicated • Support for strategy, specifically the retention of the NEC allocation and policy support for employment-led development, site intensification, in a sustainable location. • We welcome this vision document with its focus on new sustainable sites on active travel routes. • For stated order of preference for future housing land-use and retaining and enhancing the Cambridge Green Belt • limited infill in rural villages where public transport is poor and car travel is the only realistic option • support for the growth ambition and strategic direction, and inclusion of additional headroom in both jobs and housing projections. • Support Cambourne North being identified as an integral part of the strategy to meet housing, employment and community needs and deliver sustainable development. 	<p>203570 (The Crown Estate), 201528 (Stapleford PC), 205079 (Y Dignon) 202820 (Cllr K Porrer), 203900 (Cambridge Growth Company), 211535 (Martin Grant Land Limited), 211103 (Hallam Land Management), 211081 (The National Trust), 211067 (Savills), 211063 (St John's College Cambridge), 211041, 211054 (Wates Developments (and Landowners)), 210222 (Vistry Group), 208937 (Cambridge Growth Company), 208380 (NIAB Trust)</p>

<ul style="list-style-type: none"> • A strategy that includes a particular focus, and reliance, on strategic sites in Greater Cambridge is logical and supported in principle. • Supports the plan-led system in principle, and broadly supports the development strategy and approach to site allocations. • It is noted that the ‘Overview’ section of the supporting text, at para. 2.55 refers to a blended strategy to meet a variety of needs which responds to opportunities provided by different sources of supply. This general approach is supported. • It is supported that (at para. 2.55d) sites should be developed that can be well-integrated with existing communities to reinforce the distinctive character of the city, towns and villages, having regard to development at densities and in forms which make best use of land whilst creating well-designed, characterful places. • Part 1 is supported, it is considered appropriate that development should be focused within Cambridge City and on the outer edge of Cambridge, accounting for the global importance of Cambridge as the focus for growth. 	
<p>Support for the development strategy concentrating jobs and homes, within urban centres, new settlements, or in proximity to existing or proposed infrastructure:</p> <ul style="list-style-type: none"> • Prioritising new homes in sustainable locations • Reduce the need to travel and enhance co-location benefits • Promoting public and active modes is the natural choice • Locations with the least climate impact • Integrating green infrastructure 	<p>201012 (M Colville), 201657 (Huntingdonshire DC), 201023 (K Mahoney), 201376 (Gamlingay PC), 208491 (Central Bedfordshire Council) 202612 (Ickleton PC), 204701 (Optimis Consulting Ltd), 202822 (Cambridge City</p>

<ul style="list-style-type: none"> • Agree to developing sites at appropriate densities to optimise land use and create well designed places • Support for continued development of the Cambridge Biomedical Campus, intensification at Eddington, the Innovation District at Cambridge West, and the evolution of Cambourne with a new East West Rail station. • Support long term vision which will continue new homes, jobs and infrastructure beyond the plan period to help maintain a land supply and reduce need for development in less sustainable locations • Expresses clear support for the hierarchy of development set out in the policy. • Ickleton PC generally supports the Development Strategy for Greater Cambridge. 	Council Liberal Democrat Group), 202609 (Ickleton PC), 204720 (Croudace Homes), 204139 (Richborough)
Support for spatial approach directing most new development to the northern part of the district, using brownfield sites and the A14 corridor, aligning with the jobs-led housing need and sustainable growth objectives	203256 (North Herts Council)
Supports plans to increase numbers of accessible/adaptable homes (e.g. via application of M4(2) building standards).	202079 (Great Shelford Village Charity)
Support for order of preference and approach to future land use for housing and the retention and enhancement of the Cambridge green belt.	203263 (Horseheath PC)
Allocated sites within the GCLP reflect a balanced approach to growth, ensuring that development: Is appropriately scaled to the size and function of settlements, Is supported by	205849 (Lolworth Parish Meeting)

<p>infrastructure planning and mitigation, Responds to identified local and strategic needs, Protects the intrinsic character of rural communities.</p> <p>Lolworth recognises that planned development, when delivered in accordance with the Local Plan, can support sustainable growth while safeguarding the qualities that make villages such as Lolworth distinctive and viable.</p>	
<p>Concern that the development strategy is locating housing away from employment sites with negative consequences:</p> <ul style="list-style-type: none"> • Housing growth becoming dispersed while employment remains concentrated around Cambridge, increases congestion, increasing pressure on transport corridors and making sustainable travel harder. Highlights the importance of providing safe, attractive routes for walking and cycling. • Location of housing delivery away from employment sites. Residential development to be in Cambridge close to existing infrastructure and sustainable transport options. • Highlights the need for employment and housing to be planned together to avoid increasing car trips, congestion and carbon emissions, and enable equitable access for households without cars. Supports mixed-use development and co-location of homes and jobs to enable walking and cycling and reduce the need for costly public transport extensions. Also raises concern that 	<p>201738 (T Burford), 201686 (B Le Gallez), 202506 (H Brown), 203145 (Cambridgeshire ACRE), 203335 (Great Wilbraham PC), 204500 (D Potts), 204701 (Optimis Consulting Ltd), 203663 (V Ashton), 203200 (A Hoare), 204632 (Max Fordham), 205280 (A Williams), 203311 (L Dassy), 204187 (Mr and J Johnson), 205122 (J Grantham), 202451 (A Brown), 203662 (T Preud'homme), 205028 (N Spenley), 204763 (R De Beaux), 204716 (Mothers CAN Cambridge), 204559 (R Hoadley), 204658 (R Humphrey), 205438 (A Kirchgaessner), 204506 (Redrow South Midlands), 209067, 211764 (Camcycle)</p>

higher-density development and additional car infrastructure may reduce opportunities for open green space, private gardens and community spaces.

- Comment on the need for clearer detail on the geographical distribution of planned employment, that plan actually supports the needs of employees, businesses/employers, and the desired economic growth.
- Notes that the development strategy does not set out employment opportunities within out-of-town development areas, which risks forcing longer car-dependent journeys.
- Notes limited growth directed towards the south and southeast of Cambridge. Raises concern that the RSC area has very limited proposed housing compared with east and north Cambridge, despite being a major employment centre. States that low supply inflates prices and harms local communities. Argues that development in/adjacent to existing settlements—particularly along transport corridors—is more sustainable and more popular than new settlements such as Grange Farm. Recommends allocating additional development in or near Rural Centres.
- Concern strategy does not meet the needs of those living in villages, risk of concentrating growth benefits away from villages, still placing pressure on rural services and roads, little reference to cumulative impacts on village infrastructure, rural health access or digital connectivity. Limited attention to strengthening everyday service access within rural communities. Stronger rural

<p>proofing would include clearer safeguards for rural services, investment in village transport links and a stronger role for parish councils in shaping growth.</p> <p>Suggests importance of enabling plan-led and organic growth in villages to support rural community vitality and local housing needs, notes affordable and specialist housing. Recommendations for emphasis on proportionate growth in rural settlements. Calls for more explicit direction on job and housing needs in rural areas.</p> <ul style="list-style-type: none"> • Recommends development of approximately 65 dwellings in a sustainable rural settlement is seen as a modest and valuable contribution to housing needs. • Sustainable development not achievable unless no more growth and concerns over the environment. Suggests businesses, housing, roads, people, should be directed elsewhere. 	
<p>Much of the Plan's transport discussion, and wider transport debate, is framed around commuting into Cambridge. This commuter-led framing creates two problems. First, transport systems designed primarily around peak commuting struggle to deliver viable and attractive services. Second, it overlooks the fact that the majority of trips are not made for work, but for everyday activities such as shopping, education, healthcare and social life. Access to local amenities plays a far greater role in shaping travel behaviour than access to distant employment alone, yet this is not sufficiently reflected in the spatial strategy.</p>	209068 (Camcycle)

<p>In Cambridge, it is possible within this Plan period to achieve sustainable mode share of up to 90% of trips if land use and connectivity are planned in a way that provides people with local needs and high-quality active travel and public transport, whilst correctly pricing the cost of car ownership. At present, there is a risk that overly cautious assessments and a reluctance to allocate housing in more challenging locations are constraining the Plan's potential to deliver sustainable development.</p>	<p>211763 (Camcycle)</p>
<p>It is considered that the proposed development strategy fundamentally conflicts with the strategic priority relating to wellbeing and inclusion. The wellbeing and inclusion strategic priority identifies the Council's intention to ensure that 'everyone benefits from the development of new homes and jobs'. However, it is evident that this priority will not be achieved through the implementation of the proposed spatial strategy whereby the vast majority of growth is proposed to be located within the area between the A11 and A14. Figure 8 of the Draft Plan (reproduced below) illustrates how a significant proportion of the region will not benefit from any jobs or employment growth, demonstrating that the rural area of the region will not see the benefits of new development.</p>	<p>211276 (Woolsington One Ltd)</p>
<p>Many of the proposed new workspaces will be on the Wellcome Genome Campus, which is located away from railway stations and housing. Even though the Wellcome Trust works hard to provide coaches from Cambridge to Hinxton, many of the people working there drive from Cambridge and elsewhere because this is more convenient.</p>	<p>203278 (J Palmer)</p>
<p>The Local Plan should:</p>	<p>211777 (Camcycle)</p>

<ul style="list-style-type: none"> • Remove the Grange Farm allocation from the Plan • Avoid substituting constrained urban or edge of Cambridge sites with remote or poorly connected locations • Prioritise development in locations where sustainable travel can be the default from day one, without reliance on speculative or uncommitted transport mitigation. 	
<p>Objections that the strategy places an overreliance on a few large strategic sites for growth:</p> <ul style="list-style-type: none"> • Objects to the strategy as fundamentally flawed in meeting identified housing and employment needs. • Raises concern that the strategy is overly dependent on major new settlements and infrastructure that is not yet confirmed, including the proposed rail link. States that locations do not have sufficient infrastructure to support additional growth. Concern re feasibility of significant infrastructure need and impact on delivery. • A number of these strategic sites have significant constraints which will likely result in significant delays to delivery. • NPPF Paragraph 23 emphasises the need for a clear strategy for land delivery to meet assessed needs. • A 20% buffer is recommended instead of the proposed 6.5% to ensure robust planning and adequate housing supply 	<p>201929, 201938,, 201946, 201936 (M Asplin), 202035 (Wimpole Associates Ltd), 202328 (Granta Land Ltd), 202365 (The CLC Trust), 201854 (Chivers Farms Limited), 207537 (Horningsea PC), 207535 (Home Builders Federation), 203138 (ESCO Prospect), 203309 (J Manning), 206213 (Granta Land Ltd - Land at Valley Farm, Meldreth), 206071 (Wimpole Associates Ltd), 203892 (Hill Residential (Fulbourn Site)), 203965 (Hill Residential (Sawston Site)), 204043 (E W Pepper Ltd), 203317 (W Bowden), 204087 (M Richmond), 202450 (I Morris), 202160 (H Fordham), 202627 (British Land), 203069 (Pegasus Group), 206079 (Wimpole</p>

<ul style="list-style-type: none"> Historically lead to delays in delivery rates, raises concern that relying on the same approach will not deliver the required scale or pace of development, and risk that housing need is not met. This will impact 5 year housing land supply. Housing trajectory is based on over-simplistic delivery rates, and is not credible. Questions the realism of delivery assumptions, noting that current build-out at major sites such as Northstowe and Waterbeach is significantly below what would be required to achieve the target of 37,865 homes by 2045. Historical data shows a consistent delay in housing delivery from strategic sites, averaging 4.1 years longer than anticipated. Concerns with over reliance on delivery at new settlements and delivery from windfall sites, with a significant decrease in housing provision within the Cambridge Urban Area and a reduction in the rural area. Comments on over-reliance now placed on new settlements in meeting housing needs. 93% is made up of 5 sites. 44% of the proposed distribution in housing growth is now anticipated to come forward at the new settlements, compared to 23% in the adopted Local Plan and 18% in the previous Structure Plan. Objects to the growth of Cambridge and expresses a preference for no expansion of the city. States that while sustainability, biodiversity and climate goals are supported, it is not realistic to accommodate the proposed level of growth while simultaneously reducing traffic and enhancing biodiversity. 	<p>Associates Ltd), 204971 (Martin Grant Land Limited), 202081 (J Francis), 202763 (Martin Grant Land Limited), 202766 (P Norman), 203157 (Christ's College, Cambridge), 202906 (The Trustees of the C Y Nutt Deceased Will Trust), 202887 (Northwest Biotherapeutics Capital Limited), 203342 (The Varrier Jones Foundation), 204720, 208771 (Croudace Homes), 204376 (Hill Residential (Great Abington Site)), 204439 (Wain Estates), 204434 (Bellway Strategic Land), 204640 (Urban and Civic and Hill Residential), 202536 (Granta Land Ltd), 204241 (Bellway Strategic Land), 204139 (Richborough), 204420 (Bellway Strategic Land), 203924 (Emmanual College), 204122 (Emmanual College), 204164 (Tritax Big Box Developments), 204275 (Croudace Homes), 203390 (Jesus College), 203406 (Jesus College), 201940,</p>
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<ul style="list-style-type: none"> • Objects that the proposed level of housing growth is unsustainable in a predominantly rural county, stating that development would erode countryside gaps and overwhelm existing settlements such as Cambourne, and the need to address connectivity. Raises concern that recent new settlements lack community cohesion and adequate infrastructure. • Objects to scale of development, creates long term disruption, harms liveability, and is driven by development pressure rather than local need. • Recommendation for a diversified strategy with proportionate growth in expanded existing settlements and development along transport corridors to accord with NPPF which encourages development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. • strategy should plan for a higher level of employment and housing growth with a greater supply buffer given uncertainty over delivery of key sites. • Suggested that additional smaller sites on the edge of Cambridge in sustainable locations should be considered. • Suggested that additional allocations at strategic growth scale are added to Improve the pipeline supply in sustainable less constrained locations such as to the east of the subregion and at Six Mile Bottom. • Fails to allocate appropriate levels of development within settlements. Only 205 out of 13,463 homes identified for 2024-2045 will be in rural areas, suggesting 	<p>201947 (KG Moss Will Trust & Moss Family), 201964 (Shelford Investments), 202073, (J Francis), 202433 (The CLC Trust), 202554 (Ely Diocesan Board of Finance), 203576 (Horningsea PC), 204073 (South Cambridgeshire District Council), 206076 (Wimpole Associates Ltd), 203511 (ESCO Prospect), 202156 (R Lambert), 202913 (K Trudgeon), 204106 (Richborough), 206104 (Wimpole Associates Ltd), 209328 (St John's College Cambridge), 204511 (Redrow South Midlands), 208398 (Ceres Property on behalf of landowner at Freisland Farm, Swavesey), 204043 (E W Pepper Ltd), 205011, 208363, 208364, 208365, 211536 (Endurance Estates), 204850, 204868 (Great Shelford (Ten Acres) LLT), 204506 (Redrow South Midlands), 211107, 211108 (R Raywood, A Bradney and D Unwin), 204529 (Rosconn Group), 204956, 205002,</p>
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<p>more flexibility in allocations to mitigate delays with strategic sites. Additional small sites should be allocated (various sites are promoted), including in the more sustainable villages to ensure delivery early in plan period.</p> <ul style="list-style-type: none"> • Plan leaves ongoing pressure on surrounding villages through Green Belt evidence and promoted sites, despite the absence of formal allocations. • Crucial to identify small sites, including in grey belt, to increase supply of identified sites for housing, to support small/medium housebuilders, enhance housing diversity and foster local growth. • Ensure delivery of more homes earlier in the plan period. • Allocate more medium scale sites capable of delivering 150-250 dwellings. • Concern development strategy misses the sustainability benefits of homes in rural areas for community resilience and is flawed. Further small sites be allocated to ensure delivery rates in sustainable locations early in the plan period • New settlements are expected to deliver less than 40% affordable housing. • Justification for release of land from Green Belt to direct housing to sustainable locations, as significant need for housing and affordable housing. • Infill pressures already exceed the eight-dwellings-per-site limit, creating traffic and community concerns • Figure 12 shows distribution of growth with rural areas and windfalls 16%, compared to 23% in adopted plan and 30% in 1999-2016 plan. • Plan does not confirm with NPPF requirements: 	<p>211059 (Wates Developments), 205311 (Axis Land Partnerships Ltd), 206352 (Grants Land Ltd – Meldreth)), 207996 (Cambridgeshire County Council), 201968 (Shelford Investments), 202099 (Cambridgeshire County Council (Strategic Assets)), 202558 (Ely Diocesan Board of Finance), 211610, 211611 (Bloor Homes Eastern), 211584 (Terra Strategic), 211583 (Mr & Mrs Smith), 211477 (G Robinson and Partners), 211472 (Beechwood Estates Ltd), 211410, 211411 (CALA Group Ltd), 210222, 210223 Vistry Group, 208903 (Nightingale Land and Hill Residential Ltd), 208381, 208382 (NIAB Trust)</p>
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- Paragraph 73 - failing to deliver at least 10% of homes on sites no larger than one hectare, rather than relying on windfall developments. Current approach allocates 3.5% of the housing to small sites, which is below the NPPF's 10% target.
- Paragraph 83 - strategy does not align with requirement to enhance rural community vitality, in reliance on windfall developments not planned allocations.
- Current Green Belt release criteria conflict with NPPF 2024 paragraph 146
- Contradicts Dec 2024 NPPF and Feb 2025 PPG update which require a sequential approach prioritising grey belt for release, by failing to map this land the Councils bypass a national mandate to support village vitality (NPPF 83) and small-site delivery (NPPF 73).
- Plan is premature on the basis it fails to have regard to emerging revised NPPF, in particular 20% of allocations should be on sites of between 1 and 2.5 hectares.
- Objects as approach is problematic, regarding delivery timeframes, and inconsistent with key principles of the NPPF. Paragraph 72 of The Framework acknowledges the importance of strategic housing land supply comprising a sufficient mix of sites, regarding availability, suitability and economic viability.

○ Paragraph 72a states that ‘land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved’. According to this data, 94% of all new dwellings proposed between 2024 and 2045 are allocated across only 6 sites, 3 of which are new settlements. The ‘Rest of the Rural Area’ comprises rural centres and group villages, a total of 48 settlements, and has only 3 sites allocated for a total of 205 new homes. The proportion of development attributed to major, strategic sites not only carries a huge risk to deliverability but is also inconsistent with The Framework.

- Housing delivery assumptions for all of the strategic sites are reassessed, taking into account realistic annual housing delivery rates and the delivery of critical infrastructure required for those sites.
- To Release Land from the Green Belt to meet development needs.
- Make additional allocations are made in the more sustainable villages, including Fulbourn, Great Shelford, Sheene Farm, Meldreth
- Revise sequential hierarchy of types of location to account for sustainability benefits of sites adjacent to villages.
- Revise housing trajectory with realistic figures for delivery on major sites.

<p>The Draft Plan does not provide enough housing land to meet the 48,195 home target and the 73,300 job target:</p> <ul style="list-style-type: none"> • A housing land supply buffer of at least 10% (ideally 15-20 %) is required. • It is evident that the housing land identified in the Draft Local Plan is insufficient to meet the real-world need in and around Cambridge for two further key reasons: the continuing reliance on in-commuting; and the reliance on strategic sites. 	<p>207904 (Barratt Redrow), 204355 (Barratt Redrow), 204139 (Richborough), 204929 (Places for People), 203890 (Hill Residential (Fulbourn Site))</p>
<p>It is considered that the strategic priorities for the draft GCLP would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development at the more sustainable villages including Fulbourn, Great Abington.</p>	<p>203890 (Hill Residential (Fulbourn Site)), 204340 (Hill Residential (Great Abington Site))</p>
<p>Concern the strategy will not deliver the needs of a growing population:</p> <ul style="list-style-type: none"> • Green belt releases south-east of Cambridge are piecemeal and fail to represent a holistic approach to sustainable development. • Grange Farm is ill thought out, will become a car commuter settlement given its proximity to A11/M11 and ease of access towards London. It is unlikely the majority of new residents work in southern research cluster. Too small to deliver most services residents will need resulting in out-commuting. • Should deliver a comprehensive plan for south east of Cambridge, edge of Cherry Hinton, Queen Ediths, Biomedical Campus, with targeted review of inner green belt, including accessible natural greenspace. 	<p>202493, 202510, 202513, 202524 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)</p>

<ul style="list-style-type: none"> • Small targeted extension of Peterhouse Business Park would deliver new accessible rich countryside to support growing city. 	
Suggests removing or discounting speculative development dependent on unresolved infrastructure funding, provide distinction between allocated and non-allocated supply, and adopt a more cautious, deliverability-led approach that protects Green Belt land, water resources, village character and transport networks	207537 (Horningsea PC)
A strategy should be underpinned by simple enduring design principles. It doesn't have to be complicated, stick to the 'Keep It Simple" mantra.	201920 (A Davidson)
Suggestion there needs to be greater focus on mixed-use zoning with specifics on how to achieve hyperlocal and interconnected employment and community amenities. Cambridge already has many scattered zones with residential areas desperately needing local leisure and shopping areas	205292 (P Colledge)
Comment that the plans do not provide adequate development opportunities in villages around Cambridge, particularly where transport hubs exist that could support housing for employment areas.	205244 (L Gardner)
Objects that the Newlands proposal would dominate the rural landscape, is inappropriate in scale/height, and would add around 4,500 daily vehicle movements at an already congested junction. States the development would serve national/regional distribution needs rather than local needs.	202838 (W Nichols)
Comments proposed allocations, both existing and proposed, are in locations where the required public transport does not currently exist and the delivery of which is outside the control of the Greater Cambridge authorities.	209966 (Granta Land Ltd)

<p>Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners object to Policy S/DS: Development Strategy, while broadly supporting it for carrying forward allocations from adopted plans, particularly Darwin Green.</p> <p>They note a minor observation regarding the policy wording, specifically that Darwin Green is not mentioned in part 2 (b) 'on the edge of Cambridge', unlike other carried forward allocations.</p> <p>The respondents request that Darwin Green be explicitly included in the policy wording under part 2 (b), as it is represented in Figures 8 and 9 referenced in the policy.</p>	<p>203015 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)</p>
<p>Policies S/DS and S/SH should be considered together, as S/SH outlines the settlement hierarchy that informs growth locations in S/DS.</p> <p>Fulbourn is identified as a Minor Rural Centre, which should accommodate growth due to its proximity to Cambridge and good transport links.</p> <p>The respondent suggests adding a sub-category for 'Well Connected Minor Rural Centres' to better reflect sustainability, including Fulbourn, Milton, Melbourn, and Waterbeach.</p>	<p>204929 (Places for People)</p>

<p>Land north and west of Wilbraham Road, Fulbourn is proposed as a strategic site to enhance housing supply and mitigate risks associated with delayed developments.</p> <p>Changes to plan: Part 1 of the policy should be revised to refer to 'Well Connected Minor Rural Centres' and include the allocation of land to the north and west of Wilbraham Road, Fulbourn as a sustainable mixed use allocation to delivery over 2,500 dwellings.</p>	
<p>The plan should align with the Cambridgeshire and Peterborough Spatial Development Strategy:</p> <ul style="list-style-type: none"> • Combined Authority will produce a Spatial Development Strategy by 2028. Local Plan will be required to align with SDS and if not amended now will be immediately out of date. With Local Government Reorganisation this could be the last Local Plan to guide growth in Greater Cambridge area. Plan should deliver a development strategy which reflects and supports the approach being taken at both the national the regional level and ensures that the area can maximise the benefits and opportunities available at the local level. Plan period should be extended to at least 2050. • Plan period needs to be extended to 2050 to align with the Cambridgeshire and Peterborough Spatial Development Strategy and accounting for the number of strategic allocations within the plan, that will result in substantial growth after the plan period. 	<p>208396 (Ceres Property on behalf of land owner at Freisland Farm, Swavesey), 204106 (Richborough), 208377 (NIAB Trust)</p>

<ul style="list-style-type: none"> • In accordance with the requirements of paragraphs 25 and 26 of the NPPF, it is critical that the emerging DLP is aligned to the Local Growth Plan and the emerging Spatial Development Plan for Cambridgeshire. • As a starting point, this should ensure that housing and employment growth is substantially increased to align with the objectives for Cambridgeshire & Peterborough. 	
<p>Comments in relation to the impact on the rural area and rural communities:</p> <ul style="list-style-type: none"> • Concern that whilst increased housing and jobs are welcome regard must be given to existing landscape and infrastructure. There is a danger villages will be swamped. • Concern rural communities are not clearly visible within high level framing. Priorities around reducing car use and focusing development in well-connected locations could disadvantage villages unless matched with investment in rural transport, digital connectivity and local services. There is limited recognition of rural health inequalities, ageing populations and the role of parish councils and community organisations. Stronger rural proofing would ensure the strategic priorities explicitly address rural access, inclusion and infrastructure needs alongside urban growth. • Concern increasingly agricultural land is being taken, how that affects food production. 	<p>202282 (L Turton), 203140 (Cambridgeshire ACRE), 203336 (Great Wilbraham PC), 203617 (H Thomas), 201734 (R Stobbart), 205609 (Y Dignon)</p>

<ul style="list-style-type: none"> • Concern plan sets out prioritisation for urban centres and the communities and rural communities, such as Great Wilbraham, are disenfranchised. If development in smaller villages is limited the Plan should include strategies for proactively working with villages to develop more sustainability and viability for residents, potentially services such as buses, schools or shops requiring extra support and are not, in themselves cost effective. • Concern Plan encouraging sparse rural development and so unsustainable development which increases transport related emissions, climate change, harming biodiversity, producing places far from amenities, not socially included and don't foster social inclusion. • Recommends focus on building dense human-scale developments near to the amenities people want such as in the city of Cambridge. • Concerns that development which encourages car use will harm carbon emissions, landscape and rural liveability. • Support for response submitted by Cambridge Sustainable Food 	
<p>Comments in relation to the environment, green spaces and biodiversity:</p> <ul style="list-style-type: none"> • Comment that this section lacks adequate allocation for green spaces and wildlife and broadly runs contrary to that goal, leading to destruction rather than enhancement of green space within the city; this must be reconsidered with a much greater emphasis on large, healthy, biodiverse surroundings. • Suggests greater emphasis on access to nature and green spaces. 	<p>207151 (P Colledge), 202650 (S Berridge), 202156 (R Lambert), 203263 (Horseheath PC)</p>

<ul style="list-style-type: none"> • Concern that development is not grounded in the environmental limits of the area, particularly the reliance on depleted chalk aquifers and associated risks to landscape, health, and environmental quality. • All development must be sustainable; we strongly support this basic tenet of the plan. 	
<p>We endorse the proposal as it strengthens Cambridge's role in the Oxford-Cambridge growth corridor, delivers mid-tech and advanced-manufacturing capacity and aligns with the employment and economic objectives set out in the Development Strategy.</p>	203243 (Cambridgeshire Chambers of Commerce)
<p>Comment that the Plan requires further work on critical issues such as travel and flooding, which have not been adequately addressed</p>	207525 (P Deer)
<p>Support for use of development of brown field sites and repurposing of empty buildings, less development of green belt and green spaces.</p>	201156 (G Briscoe), 201682 (S Smith)
<p>Comments that the strategy omits provision for attitudinal change towards affordable, sustainable, healthy, local food.</p>	205079 (Y Dignon)
<p>Comment highlights the long-term strategic potential of the Ashwell and Morden area, outside the Green Belt, well-connected by rail and suitable for sustainable growth and suggest it be explored for future housing provision</p>	203257 (North Herts Council)
<p>The general strategic approach of the Plan to develop new settlements and significant extensions to the largest settlements is consistent with NPPF and specifically NPPF 77, provided the development is supported by the necessary infrastructure and facilities</p>	210982 (C Newell)

<p>The strategic policy approach takes the pressure off the middle-sized and smaller villages of South Cambridgeshire which are rural and generally poorly supplied, with a high proportion of Conservation Areas and other designations and generally a closer relationship between the village and its rural surroundings. This proposed Plan prioritised approach also ensures sustainable housing is easier to implement once the infrastructure and facilities are provided.</p>	<p>210985 (C Newell)</p>
<p>Currently the planned provision of Infrastructure and facilities is questionable, especially in the supply of water and electricity and in the treatment of sewage, and especially their viability within the next 5 years when they are relying on a failing aquifer, depleted chalk streams and overburdened local facilities. The current Plan relies too much on a future Fens reservoir that is at a very early stage and the proposed re-purposing and intensification of extraction from Grafham Water, both of which are outside the Development Plans area and are likely to have significant impacts which are not made clear.</p>	<p>210986 (C Newell)</p>
<p>Concern plan does not provide clear modelling of how Section 106 and CIL contributions will be used to improve village connectivity</p>	<p>207997 (Cambridgeshire County Council)</p>
<p>Suggests the term “Rural Centres” is misleading – these settlements are close to Cambridge and well-served, they should not be grouped with larger hub villages; “Minor rural centres” function more like suburban areas</p>	<p>207998 (Cambridgeshire County Council)</p>
<p>Amend Policy S/DS to include:</p>	<p>211420 (Wilson Bowden Developments Limited)</p>

<p>1. The need for jobs and homes will be met as far as possible in the following order of preference, having regard to the purposes of the Cambridge Green Belt:</p> <p>"c) On the edge of Royston; "</p>	
<p>The North Herts Economic Strategy 2025-2030 notes that given the proximity of The York Way industrial area in Royston to Cambridge and London, every attempt should be made to forge wider and deeper links to the Cambridge Sub-Region (at page 17).</p> <p>Whilst the Plan now includes two new class B2/B8 allocations, this leaves the Cambridge supply effectively limited only to these two sites, such that possible investors seeking industrial floorspace are faced almost with a duopoly position.</p> <p>Provision of additional land for class B2/B8 floorspace as part of Royston’s cluster of ‘major advanced manufacturing and life sciences’, should be supported, both to meet North Hertfordshire objectives and address any Greater Cambridge shortfalls that may flow from the Local Plan.</p>	211419 (Wilson Bowden Developments Limited)
<p>Concern that the approach limiting development in villages will not support improvements to rural transport connectivity.</p>	210999 (Cambridgeshire County Council)
<p>Strategy Topic Paper which summarises the SA growth options assessed states that edge of Cambridge sites in the Green Belt, or urban extensions to Cambridge, would be likely to deliver more homes within the plan period than those away from Cambridge. Yet, the spatial strategy is allocating sites away from the edge of the city which</p>	209696 (CEG Land Promotions Ltd)

<p>evidence shows deliver more slowly in this geography. It also notable that the GCLP carries forward allocations in the urban area which have not delivered since the adoption of the previous local plans. There are well documented difficulties around the viable delivery of brownfield sites in the current economic climate so assumptions about their delivery should be realistic in this context.</p>	
<p>Greater Cambridge is vital to the economic aspirations of the UK, both now and in the future. However, to ensure that continues, the GCLP needs to respond positively to the concerns raised by a range of stakeholders which would threaten the delivery of sustainable growth in the area, which include: 1) the delivery of a quantum of housing that will enable the job growth expected across the wider Greater Cambridge region, including a wide range of sizes and tenures, to ensure that businesses can draw upon the necessary labour pool; and 2) the location of houses in areas which are accessible to and well supported by public transport links and can take advantage of the significant investment that is going into improving local infrastructure such as the delivery of Cambridge South station, East West rail and new guided busways.</p>	209691 (CEG Land Promotions Ltd)
<ul style="list-style-type: none"> • Concern Policy S/2 (Spatial Strategy) should demonstrate a clear “brownfield first” approach, consistent with NPPF paragraphs 11 and 119, prioritising the reuse of previously developed land, empty homes, and under-used buildings. • Growth should not be directed to locations where inclusive access cannot be delivered. 	208948 (CPRE Cambridgeshire and Peterborough)

<ul style="list-style-type: none"> • Development in areas lacking accessible pavements, crossings, or step-free routes risks excluding disabled people and conflicts with the Public Sector Equality Duty (Section 149, Equality Act 2010). 	
Edge of Cambridge should be lower in the order of preference than Cambourne and new settlements.	201012 (M Colville)
<p>S/PRIA/EG and EW Bridge and Underpass(es) cultural hub Project:</p> <ul style="list-style-type: none"> • I support development within the designated PRIA of a Cultural Hub offering accessible programme. • The area surrounding the bridge and underpasses is lacking a sense of place. • Introduce community, sports and cultural programme and upgrades to the public realm to promote safety and identity. • Strengthen active transport N/S and E/W connections around the infrastructure for better connectivity, prioritising residents and visitors. 	205237 (University of Cambridge)

Jobs and homes

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Supports Development Strategy and recommends that allocations, housing and employment growth identified, are a minimum requirement with flexibility allowing optimised levels of growth. Allocations identify options for expansion and extensions	203908 (Cambridge Growth Company)

where these can be supported in transport, landscape, and in green and other infrastructure terms.	
Supports target of 48,195 houses, with headroom of 30-69% above the incremental target of 10,330 homes, likely probability of meeting or exceeding the target.	201012 (M Colville)
Comments planned developments resulting in additional 17,950 homes after 2045, will help meet future expansion requirements and provides additional headroom.	201012 (M Colville)
Comments housing requirement is not aligned with jobs growth, increasing car commuting into Cambridge, and not meeting climate change strategic priority.	201941 (KG Moss Will Trust & Moss Family), 201966 (Shelford Investments), 202075 (J Francis), 202433 (The CLC Trust), 202555 (Ely Diocesan Board of Finance)
<p>Concern over amount and location of jobs and homes:</p> <ul style="list-style-type: none"> Concerns over increased number of jobs and homes in Cambridge. Jobs needed elsewhere. Concern over number of housing numbers. You say you want an additional 48,195 homes, Northstowe and Waterbeach provide 37,865 homes, and additional sites 13,460 homes. These add to 51,325 homes not 48,195. Cambourne North will provide 13,000 new homes, Cambourne 2350 and Grange Farm 6000. This is way more than 13,460. Concern Plan does not provide analysis of employment growth to match its housing evidence, are homes and jobs are being planned together. Growth in 	201223 (S Williams), 201500 (C Meads), 201699 (R MacDonald), 201992 (D Langley), 202861 (J Williams), 203197 (G Orwell), 204043 (E W Pepper Ltd), 204160 (Mr and Mrs J Johnson), 204908 (K Brightwell), 201499 (C Meads),

jobs only where equivalent new housing can be provided, within cycling distance and good public transport links.

- Concern plan envisages housing growth over a wider area, with employment still focussed around Cambridge, leading to pressure on transport corridors, and making sustainability harder. Need detail of where employment will be located, that transport issues can be addressed.
- Concerns housing becoming more dispersed and employment concentrated around Cambridge.
- Concerns that the allocation of 10,330 homes between 2024 and 2045 is insufficient for sustainable growth in Greater Cambridge.
- Concerns a lack of housing in smaller villages is a constraint on sustainable development, new households would need to relocate away from their communities.
- Request to identify a broader range of housing sites in South Cambridgeshire's rural areas to promote sustainable growth and support local economies.
- Concern housing distribution disregards the CPIER report's recommendations, reducing flexibility of housing delivery and limit market choice.
- Comments commute from Cambridge satellite towns to the city centre challenging and residents of these towns are reliant on cars as public transport connections are poor

<ul style="list-style-type: none"> • Travel to work when settlement is dispersed but employment is all within the city is an issue. • Dispersed growth increases pressure on transport corridors and reduces sustainability • Detail of where employment is planned across the geography requested • The report by IcenI (Greater Cambridge Employment and Housing Evidence Update) considers the central employment scenario was the best option, suggesting 66,600 new jobs. Yet your plan is for 73,300 new jobs. This is incorrect. You cite the IcenI report but it doesn't mention 73,300 jobs. Its higher growth scenario suggested 76,700 jobs, but says it's unlikely. Their range was from ~30k-78k and you do not explain why you've mis-cited the report and taken a very high estimate incorrectly. The number of houses needed is based on the number of jobs, so you have over-estimated the number of houses needed. 	
<p>Housing and employment supply figures are overstated and insufficiently robust.</p>	<p>203576 (Horningsea PC)</p>
<p>Concern on reliance on windfall sites for housing delivery, declining numbers suggest need for certainty in small and medium-sized site allocations.</p>	<p>201854 (Chivers Farms Limited)</p>
<p>Consider the undesirability of maintaining high windfall assumptions and instead allocate a greater number of sites. Promoting greater levels of delivery on allocations and lower levels on windfall sites would give Councils a greater level of control over development coming forward and would encourage plan-led development in line with the NPPF's ambitions. Windfalls are inherently uncertain, it is hard to plan the</p>	<p>211674 (SmithsonHill), 211045, 211046, 211058 (Wates Developments (and Landowners))</p>

<p>necessary infrastructure around such a significant scale of windfall development, especially if it comes forward in a piecemeal nature.</p> <p>High reliance on windfall sites is much more likely to lead to unsustainable village development than a strategy where the Council has control over ensuring village development is located where there is good access to a high quality public transport network and provides the required infrastructure.</p>	
<p>Objection that Policy S/DS identified housing and job needs are too conservative:</p> <ul style="list-style-type: none"> • The allocation of 10,330 homes from 2024 to 2045 is insufficient for sustainable growth in Cambridge. • Do not align with the government's growth agenda for Greater Cambridge. • To match Oxford-Cambridge corridor. • Supporting text at Para 2.64 does not consider that development needs alone provide the exceptional circumstances to justify removing land from the Green Belt, however the ambitious growth context for Cambridge means that the Council needs to consider the potential release of Green Belt land. • Supporting text in paragraph 2.64 does not consider the potential for Green Belt land release, despite the possibility of new evidence changing this context. • Do not reflect the higher growth scenarios identified in the latest employment and housing needs update. • Requests site allocated to meet the increased demand. 	<p>203157 (Christ's College, Cambridge), 203390 (Jesus College), 203406 (Jesus College), 202035 (Wimpole Associates Ltd), 204043 (E W Pepper Ltd), 206075, 206103, 206095, 206092, 206070, 206100 (Wimpole Associates Ltd), 210311 (Russell Smith Farms)</p>

<ul style="list-style-type: none"> • Plan assumes a 'central' rather than a 'high' scenario aligning more with a growth trend over the last 20 years than the higher growth of the last 10 years despite national aspirations for sustained economic growth in the area. • Needs identified through the draft Local Plan do not reflect Cambridge's potential and are not sufficiently ambitious. 	
<p>Comments strategic priorities of the Plan delivered only with higher housing requirement, an amended development strategy, and additional development on the edge of Cambridge.</p>	205046 (North Barton Road Landowners Group)
<p>Concern that the Plan does not address local housing needs adequately, particularly in terms of affordable housing, potentially exacerbating affordability issues in communities like Histon and Impington</p>	207589 (Chivers Farms Limited)
<p>Comment that Plan does not provide a clear spatial analysis of employment growth to match its housing evidence, making it difficult to assess whether homes and jobs are being planned together. Without either a better balance between housing and employment or a step change in direct, high-quality active travel and public transport connectivity, the spatial strategy risks locking in long-distance travel and car dependency for decades.</p>	205229 (J Thomas)
<p>Concerns as no recognition of self-and-custom-build housing as a strategic requirement, (statutory duty under the Self-Build and Custom Housebuilding Act 2015 and supporting national policy). As placed in policy (H/CB) and not spatial strategy, plan</p>	201936 (M Asplin), 202086 (M Asplin)

risks not addressing the backlog on the self-build register. Strategy not positively prepared and compliant with national policy, PPG, or legislative requirements.	
Supports the development of specialist housing in sustainable locations but requests that planning decisions consider the existing number of specialist housing units in the development's locale to prevent overwhelming healthcare services and to maintain a balanced community demographic.	201547 (Stapleford PC)
Scaling up to meet aggressive housing targets can be achieved by a well architected hub-and spoke model.	201920 (A Davidson)

Employment provision

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Comment that there is a lack of clarity how the employment floorspace will be distributed across the proposed allocations within the plan	208498 (Central Bedfordshire Council)
Concerned that the Plan cannot respond to the inherent creativity and unpredictability of business. Ensuring approach has some additional flexibility and responsiveness.	203887 (Histon and Impington PC)
The Policy direction facilitates the ability of Rural Centres and Minor Rural Centres to meet objectively assessed needs for jobs. The Site (Evolution Business Park, Milton Road) is strategically located between a Rural Centre and a Minor Rural Centre, with good access to nearby Milton Park and Ride and therefore represents a viable site to	206949 (Cambridge Realty Limited)

<p>accommodate the development requirements of the Plan period. The provision of 73,300 additional jobs should be more aspirational and align closer with the vision-led test of the NPPF. Policy S/DS should recognise longer term targets for additional jobs and preferred development areas. Recognising these aspirational targets including reference to forthcoming development in suitably sustainable locations ensures that the Council's approach remains forward looking, avoids inadvertently constraining employment land within the Greater Cambridge area, consistent with wider national planning policy objectives.</p>	
<p>In terms of employment delivery, Endurance Estates suggest should consider a more flexible approach which recognises the loss of Industrial and Mid-Tech floorspace in recent years. The Evidence Base outlines a clear need for additional Industrial and Mid-Tech floorspace and references requirements for B8 floorspace locations on the SRN. This is supported, however in light of the high-level of demand, it is considered that a flexible approach to locations would be most appropriate. This should include, as a minimum, support for locations along other radial routes, including the A10 south of Cambridge.</p>	<p>209712, 209713, 209711, 209708, 209709 (Endurance Estates)</p>
<p>Policy fails to reflect the outcomes of the published evidence base in terms of the locational requirements of general industrial uses.</p> <p>Greater Cambridge Warehouse and Industrial Space Needs Report (2025) concludes that c.30% of the residual industrial land need is for sites on the urban fringe (for</p>	<p>209174 (Turnstone Real Estate Limited)</p>

<p>general industrial and MidTech uses, as well as last mile local distribution).</p> <p>However, the strategic employment allocations fail to identify sites that meet the identified locational requirements for general industrial operators, and are capable of being delivered in the short term to meet identified needs. The strategic sites identified in Policy S/DS generally fall into 2 categories a) delivery as part of a large mixed use allocations; or b) sites on the A14.</p> <p>The WISN explains the importance of this locational requirement for the general industrial and MidTech sectors, specifically those wholesale and trader counter operators, whose business model is based on being in close proximity to its customer base.</p>	
<p>In Cambridgeshire and Peterborough, the Agri-Food & Tech sector employs 3,500 people across 115 companies, generating approximately £1billion in revenue. Agri-Food & Tech businesses benefit from excellent land quality for farming, world-renowned academic institutions, a strong supply chain in terms of international food processing, food packing, distribution and logistics, and world leading R&D facilities.</p> <p>The Local Growth Plan projection maps predict growth of the agri-food and tech sector by £1.2bn by 2050 and expect to see employment growth in this sector of 7,700, a 57% increase from now. Sustainable sites which can be delivered early in the plan period,</p>	208385 (NIAB Trust)

<p>such as NIAB's sites at Park Farm, would support this ambitious level of growth in the agri-food and tech sector, and as such it is considered that they should be allocated in the DLP.</p>	
<p>The spatial distribution policy, identifying site allocation S/SHF for c. 240,000 sq.m of B2/B8 uses – i.e. 65 % of the total industrial and warehouse allocation provision in the GCLP – is supported. The strategic location and size of the allocation site provides flexibility and choice to the, historically constrained, Greater Cambridge market. There is no merit in policy S2e(i) prescribing units be limited to small-medium size. This would distort the functioning of the market, by limiting choice to meet business needs on the principal and largest employment allocation site.</p>	204970 (Lolworth Developments Limited)
<p>Trinity Hall consider that an updated version of adopted allocation M5 be added to chapter 3 of the Draft Plan to confirm that the site of 82-91 Hills Road and 61-63 Bateman Street is allocated for commercial redevelopment.</p>	202773 (Trinity Hall)
<p>Comment on impact of proposals for new large logistics and business sites between the A14 Swavesey J24 and Bar Hill J25 junctions, and major new housing at Cambourne North, Bourn and continued development of Northstowe, will impact both highway and water infrastructure around the Swavesey area.</p>	203039 (Swavesey PC)
<p>Selecting only 2 large sites to deliver the majority of Greater Cambridge's industrial and logistics space is considered to be ineffective. Through S/SHF approximately 70% of all Industrial & Logistics need will be delivered by one land promoter. This creates risk to the deliverability.</p>	211687, 211689, 211690 (Newlands (Cambridge) Limited)

<p>Location of large scale logistics schemes adjacent to the Strategic Highway Network, and away from residential locations can help to reduce congestion and emissions, and improve air quality and public health. NPPF Paragraph 110, Appeal decisions (APP/C3105/W/24/3352512) have emphasised that the operational needs of Logistics outweighs any perceived disadvantage from an accessibility perspective.</p>	
<p>Policy fails to reflect the outcomes of the published evidence in supporting the displacement of existing industrial land due to the emphasis on allocating large, complex sites.</p> <p>The Development Strategy delivers the majority of the employment requirements, in particular general industrial space, on sites off the A14 or as part of larger mixed-use site redevelopments, such as North East Cambridge or Cambridge East.</p> <p>The need for general industrial space to support the local economy is immediate and urgent, and the over reliance on large complex sites will cause further unacceptable and unnecessary adverse impacts to this sector.</p> <p>Furthermore, allocated sites such as North East Cambridge already contain existing general industrial floorspace. Whilst the policy aspires to deliver replacement space as part of any redevelopment scheme, there will inevitably be a period of time when the existing use is displaced pending its reprovision. During this time, it is important that</p>	<p>209175 (Turnstone Real Estate Limited)</p>

<p>opportunities exist in the right location to rehouse these employment uses to ensure that they continue to meet the needs of the local resident population, but that they do so in an efficient and sustainable manner that does not result in increased vehicular trips by the private car.</p>	
<p>The proposed Tritax development does not form part of the GCLP's spatial strategy and has not been identified as a suitable or necessary allocation through the plan-making process. Allowing a speculative, large-scale logistics development outside of the adopted or emerging plan framework would fundamentally undermine the integrity of the Local Plan system.</p> <p>The GCLP directs major employment and logistics development to locations that are:</p> <ul style="list-style-type: none"> - Strategically planned - Well connected by appropriate transport infrastructure - Capable of accommodating such uses without unacceptable harm. <p>The Tritax proposal does not meet these criteria in the context of Lolworth.</p>	<p>205850 (Lolworth Parish Meeting)</p>
<p>BRC object to the policy and request that point ii is reworded as below: Babraham Research Campus – a new employment-led mixed use allocation to support further growth of this existing world leading bioscience research and innovation campus and improve the health and wellbeing of future employees, residents and the local community through targeted environmental enhancements: including approximately</p>	<p>203462 (Babraham Research Campus)</p>

<p>48,000m2 employment floorspace for office and research & development and approximately 83 additional homes, supported by focused additional facilities that complement existing local services;</p> <p>Changes to plan: Please see comments above regarding rewording of the policy to reflect approximately 83 additional homes.</p>	
<p>Paragraph 87 of the NPPF identifies the importance of making provision for clusters and networks of data-driven, creative and high technology industries and the inclusion of new facilities and infrastructure that are needed to support the growth of these industries (including data centres). Cambridge is known as an area of excellence for science and technology sectors, including the large number of science parks located around the city and surrounding villages. It forms part of the Oxford-Cambridge Arc, which is a globally significant growth corridor, labelled as Europe’s Silicon Valley. Major infrastructure projects such as the forthcoming East West Rail have added to the productivity and sustainability of the area. Therefore, it is considered that the construction of a data centre, or wider B2/B8 use on the Site would be in line with the requirements set out within national planning policy.</p>	211515 (Trinity College, Cambridge)
<p>We object to the employment allocations as listed in the policy (point 2). There is need to identify additional sites for employment development, including to the south of Cambridge. An additional site should be allocated to deliver a major Data Centre tailored to the needs of the AI boom, complemented by innovation-inducing</p>	210314 (Russell Smith Farms)

<p>infrastructure in agricultural technology to contribute the local community's talent pool and economy, whilst making a global presence for Cambridge in AI.</p>	
<p>Greater Cambridge needs to adopt a much more substantial housing supply buffer than the 6.5% currently proposed.</p> <p>As a result, Greater Cambridge should employ a housing land supply buffer of over 10% and preferably circa 15-20% above the identified requirement which, for the reasons set out under the Policy S/JH: New Jobs and Homes, also needs to be higher than the Standard Methodology figure.</p>	<p>211103 (Hallam Land Management), 211067 (Savills), 211063 (St John's College Cambridge)</p>
<p>The draft Local Plan illustrates within Table 4 that with the inclusion of capacity at North East Cambridge a 14.7% buffer, in excess of the minimum housing requirement, would be provided. However, with insufficient certainty over deliverability of this site it should be excluded from the calculation and therefore a resultant buffer of just 6.5% would remain. This is insufficient and therefore additional site allocations should be included at this stage in the plan making process to ensure the plan is effective (deliverable over the plan period) as required by the NPPF.</p>	<p>211044, 211057 (Wates Developments (and Landowners))</p>
<p>To encourage a more reliable delivery rate across the plan area we propose that additional sites are allocated to ensure the consistent delivery of dwellings to significantly boost the supply of homes as required by Paragraph 61 of the NPPF. Only 17 of these 19 sites are strictly 'new'. In total the 17 sites will provide 7,013 dwellings (equating to approximately 12.69% of the total supply). It is therefore clear that the Plan</p>	<p>211043, 211056 (Wates Developments (and Landowners))</p>

<p>continues to make provision for a very limited number of new sites. There is a heavy reliance on existing and previously identified sites rolled forward from the adopted Local Plans and many of these sites are on a large scale which also means they typically take longer to be brought forward.</p>	
<p>CGC is supportive of the Development Strategy identified in the draft Plan but recommends that the planned allocations and the housing and employment growth identified in each, are treated as the minimum requirements and that the allocations are flexible enough to allow for optimised levels of growth. Identification of options for future expansion and extensions of these allocations where these can be supported in transport, landscape, and in green and other infrastructure terms is supported by CGC.</p>	208937 (Cambridge Growth Company)
<p>Dernford Reservoir site Concern for shortage of large-scale plant science, indoor farming and agritech type uses in the southern Cambridge corridor, where Dernford Reservoir is located and no provision made for Data Centre uses. There is a significant need for this use type within the area, given the location of the site in close proximity to the large employment sites at; Granta Park, Babraham, Wellcome Genome and the Biomedical Campus. Plan does not conform with the NPPF requiring Local Planning Authorities to identify suitable locations for data centres. The draft plan does not make any reference to data centres, nor identified within the accompanying Greater Cambridge Warehouse and Industrial Space Needs Assessment.</p>	210310, 210315 (Russell Smith Farms)

Strategic and smaller scale development

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Concern large strategic site allocations predicted housing delivery rates are unrealistically high, and the delivery timetable for infrastructure to support these is uncertain.</p>	<p>201940 (KG Moss Will Trust & Moss Family), 201964 (Shelford Investments), 202073 (J Francis), 202554 (Ely Diocesan Board of Finance), 211410, 211411 (CALA Group Ltd). 205104 (Axis Land Partnership)</p>
<p>Concern over ability of strategic sites-focused development strategy to meet Housing and affordable housing needs; would approach support residents or services and facilities in those villages, and would not meet the great places, homes, connectivity and infrastructure strategic priorities services and facilities in those villages, or meet the great places, homes, connectivity and infrastructure strategic priorities.</p>	<p>201941 (KG Moss Will Trust & Moss Family), 201966 (Shelford Investments), 202075 (J Francis), 202555 (Ely Diocesan Board of Finance)</p>
<p>Comments strategic priorities would only be fully delivered with a higher housing requirement, an amended development strategy, and additional development at the more sustainable villages including Willingham, Fulbourn, Sawston, Hardwick, Great Abington, Bar Hill</p>	<p>203303 (J Manning), 203890 (Hill Residential (Fulbourn Site)), 203918 (Hill Residential (Fulbourn Site)), 204130 (Hill Residential (Hardwick Site)), 204346 (Hill Residential (Great Abington Site)), 211599 (LGH Hotels Management Limited), 211478 (G Robinson and Partners)</p>

<p>The plan should include a greater mix of smaller and medium sized sites:</p> <ul style="list-style-type: none"> • Agrees identifying numerous small sites for development is impractical due to inadequate infrastructure in rural areas and potential negative impacts on green belt. • Concern plan does not allocate small and medium-sized sites needed for housing delivery and supporting small builders, despite their importance highlighted in the NPPF. The focus on large developments limits choice for prospective homeowners, and local residents to remain in communities. • To provide a realistic five year housing land supply, as these sites come forwards quicker • To enable a wide range of house builders to enter the market and provide a wider range of product and increase in local employment • Suggests a balanced approach including more allocations in rural villages to support local housing needs and prevent population imbalance. • Allows the SME sector to grown, delivering homes to increase the range of new homes available, and aligns with paragraph 73 of the NPPF. 	<p>201547 (Stapleford PC), 201854 (Chivers Farms Limited), 206215 (Granta Land Ltd - Land at Valley Farm, Meldreth), 204043 (E W Pepper Ltd), 211457 (Hayfield Homes Construction Ltd), 211518 (Endurance Estates), 211105 (Hallam Land Management), 211473 (Beechwood Estates Ltd), 211478 (G Robinson and Partners), 211532 (Hopkins Homes), 211231, 211579 (Living Space Housing), 201854 (Chivers Farms Limited), 211262 (Terra Strategic), 204102, 204144, 204145 (GW Balaam & Son)</p>
<p>The Development Strategy fails to accurately provide for rural and village growth to ensure sustainability and vitality of settlements, particularly sustainable large villages:</p> <ul style="list-style-type: none"> • Minor Rural Centres are referred to as part of the development strategy but there are limited allocations – add growth at the more sustainable villages with a very good range of services and facilities, accessible by a range of modes of 	<p>211612 (Bloor Homes Eastern), 211604 (LGH Hotels Management Limited), 211584 (Terra Strategic), 211534 (Hopkins Homes), 211516 (Endurance Estates), 211415 (CALA Group Ltd), 211068 (Savills)</p>

<p>transport, and where there is an identified need for affordable housing for those with a local connection to the village.</p> <ul style="list-style-type: none"> • Additional population helps in sustaining and improving the viability of existing services. • Growth within villages, including villages within the Green Belt, is essential to ensure they continue to be vibrant, inclusive communities with new opportunities for residents to stay in those communities. • Growth in villages should be better prioritised to ensure that those who wish to live in the rural areas are able to do so and that there is a variety of choice for the rural community. It is important that villages have adequate incremental growth to sustain the services they currently offer as well as offering appropriate additionality of services to avoid them becoming “sleeper villages”. <p>Plan makes allocations for just 265 homes on four sites adjacent to existing villages (Duxford, Highfields, and Melbourn). This is the outcome of a fundamental flaw in the framing of the hierarchy of locations within this policy, which reflects an approach to sustainability that gives predominant weight to environmental factors, notably transport emissions, to the detriment of the social sustainability of existing settlements.</p>	
<p>Supports rural area at the bottom of the preference list.</p>	<p>201012 (M Colville)</p>
<p>The proposed development strategy sets out where new homes and jobs identified in Draft Policy S/JH are to be provided to meet the visions and strategic priorities of the Plan. The strategy is reliant on previous allocations from the adopted Plans. New</p>	<p>211218 (Terra Strategic)</p>

<p>strategic scale allocations are proposed (a) within the Cambridge urban area; (b) on the edge of Cambridge; (c) at New Settlements; (d) In the Rural Southern Cluster and (e) In the Rest of the Rural Area.</p> <p>The remainder of the development needs are to be met at smaller sites within; a. Cambridge urban area; and b. the rural area, where further development is to be limited with allocations for jobs and housing focused on Rural Centres and Minor Rural Centres, and the settlement hierarchy policy providing for windfall development for different categories of village consistent with the level of local service provision and quality of public transport access to Cambridge or a market town. National Policy sets out a requirement for small and medium sized sites to be identified to accommodate at least 10% of the overall housing requirement on sites no larger than one hectare, unless it can be shown that there are strong reasons why the 10% target cannot be achieved.</p>	
<p>Concerns there are a number of risks with the development strategy. The proposed that 44% of housing target delivered at new settlements is very reliant on the delivery of the existing strategic sites, there is no evidence that delivery at these sites will increase above current rates. It is assumed that housing delivery at some of the strategic sites would be 300 dwellings per annum, but this rate has not been achieved at existing strategic sites in Greater Cambridge or delivered at these rates for a sustained period. The housing delivery rates at some of these strategic sites appear optimistic and not evidence based. The delivery of the proposed strategic sites at Cambourne North and</p>	<p>211245 (Manor Oak Homes – Cottenham Site), 211253 (R Harvey)</p>

<p>at Grange Farm are reliant on delivery of transport projects that are not approved, and where funding and delivery timescales are uncertain. Most of the existing new settlements will deliver less affordable housing than the policy requirement of 40%, due to these developments to also deliver significant levels of new transport and community infrastructure in initial phases The same for affordable housing delivery at Cambourne North and at Grange Farm. It is requested that the housing delivery assumptions for all of the strategic sites are reassessed.</p>	
<p>Concern that the Strategy lacks sufficient allocation of housing sites in existing settlements, which could enhance delivery speed and promote the vitality of these areas. Include new sites in sustainable village locations, which would provide local benefits, including affordable housing and support for existing services.</p>	207189 (ESCO Prospect)
<p>Concern that the scale of development deemed acceptable in Group Villages, (which includes Over), is too low. This restriction does not reflect Over's sustainability and capacity for further housing.</p>	207191 (ESCO Prospect)
<p>North East Cambridge should remain included in core numbers</p>	201012 (M Colville)
<p>Concern draft allocation not capturing the full capacity of the safeguarded land or the additional 131 ha of expansion land at Cambridge East, limiting transformative growth, jobs and homes.</p>	209031 (Marshall Group Properties)
<p>Responder questions soundness of Plan given lack of certainty of deliverability of NEC and Grange Farm within the Plan period and meet need, questioning whether further green belt release is required.</p>	211444 (Gonville & Caius College)

<p>Concern North East Cambridge is retained, as should no alternative funding become available ahead of the Regulation 19 stage later in 2026, it would be unsound to continue to include the site for allocation in the Plan.</p>	<p>203069 (Pegasus Group)</p>
<p>Support for Strategy for Cambridge Business Park at the heart of NEC and TCE is advancing proposals to comprehensively re-develop the site to deliver significant employment-led development and intensification of the site and is clearly aligned with the Development Strategy. Policy criteria 2(a)(i) sufficiently supports development in NEC in the event the CWWTP is not relocated away from the site, which is uncertain during the plan period.</p>	<p>203570 (The Crown Estate)</p>
<p>Concern Cambridge East allocation is it realistic given Marshalls has cancelled its planned move from Cambridge Airport, delivery trajectory is considered to be uncertain.</p>	<p>203069 (Pegasus Group)</p>
<p>Concern over omission of land at South West Cambridge, include to enhance strategic transport connections and support sustainable mixed use development</p>	<p>202440 (University of Cambridge),</p>
<p>Comments on the Cambourne Expansion:</p> <ul style="list-style-type: none"> • Support the aspirations to substantially expand Cambourne. Concerns regarding accessibility along the A428 from southern Huntingdonshire, particularly St Neots, into Cambridge and its surroundings. • Concern of impact on the small villages north of Cambourne or the farming land which provides food for the existing population. • Concern that Cambourne and Northstowe have been unsuccessful at fostering sustainable communities with real centres and amenities. 	<p>201657 (Huntingdonshire DC), 201682 (S Smith), 205673 (M Meyer-Kelly), 202122 (Elsworth PC)</p>

<ul style="list-style-type: none"> • Cambourne North is a new settlement, separated from the existing town by a trunk road and railway, and not an organic outgrowth of existing Cambourne. • There is also perhaps a sense of rectifying things that were not got right originally (e.g. the lack of a town centre). • Whether integration will be “supporting services and facilities” in anything but the long term seems unlikely. 	
<p>Comments on Grange Farm include:</p> <ul style="list-style-type: none"> • Concern Grange Farm will provide homes with good transport links to London, encouraging commuters to take a large proportion of the accommodation, negating the intended good environmental outcomes. • Concerns in scale of delivery where the planned sustainable development of the south-east edge of Cambridge could replace some of what is proposed at Grange Farm, Abington to achieve a smaller and more appropriately sized development. • Concern site location and setting is within the least spoilt and most attractive landscape surrounding Cambridge and issues with development density and lack of identity. Recommends site be rejected from Development Strategy as alternate sites in far less sensitive landscape that are better suited to a 6000 house development. • Objects as development in/around Rural Centres is more sustainable than at Grange Farm (existing infrastructure, amenities, etc). 	<p>201894 (R Pargeter), 202526 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 203405 (B Reeve), 204160 (Mr and Mrs J Johnson), 203069 (Pegasus Group)</p>

<ul style="list-style-type: none"> • objection to the proposed allocation under Policy S/DS at point “2.c. new settlements”, “ii. Land adjacent to the A11 and A1307 at Grange Farm • predicated on the Cambridge South East Transport (CSET) busway coming forward to make sustainable • questioned whether Grange Farm will be capable of delivering any new homes within the plan period • comments more appropriate to adopt an alternative Development Strategy which offers a more balanced approach to the distribution of growth, which recognises the role of existing sustainable settlements. • Comments significant doubt over the ability of the proposed allocations to deliver new homes within a timely manner and challenges the justification for the inclusion of Grange Farm within the Plan. Not planning positively to meet its identified needs as required by national planning policy (para 36). 	
<p>Concern the policy limits the size of development at ‘minor rural centres’ and lower tiers. The policy should not restrict the scale of growth for rural settlements, as this may affect the settlement's ability to maintain its existing facilities and support necessary growth. The Council should therefore consider the delivery of services and facilities alongside the planned strategic growth of settlements.</p>	208340 (Thakeham Homes Ltd)
<p>The strategy lacks justification and consistency with national planning policy, failing to consider suitable alternatives or deliver sustainable development.</p> <p>Support for the expansion of Cambourne, but the development framework should</p>	203963 (Abbey Properties Cambridgeshire Limited)

<p>include existing food retail uses at Caxton Gibbet, the EV charging car park and land to its east suitable for various uses.</p> <p>The boundary appears to follow the outline planning permission for Cambourne West without further review, which may not be appropriate.</p> <p>The concentration of allocations in the rural southern cluster limits opportunities in other rural areas, despite comparable transport links in locations like Girton, Oakington, and Over.</p> <p>A more dispersed growth strategy for villages would help sustain them and better utilise the infrastructure delivered across Greater Cambridgeshire.</p> <p>The approach aligns with Appendix D of the Local Plan regarding housing requirements for Neighbourhood Plans.</p> <p>Errors in the policy include unnamed Figures and unclear wording in part 2 c 2.</p>	
<p>Comments that large site allocations present an opportunity to deliver sustainable travel at scale, but priority must be given to walking, cycling, and public transport, embedded from the beginning.</p>	207540 (R De Beaux)
<p>Higher-density development can support sustainable travel, but only when it is paired with low car ownership and strong alternatives to driving. Dense schemes are too often</p>	204716 (Mothers CAN Cambridge)

<p>delivered alongside high levels of private parking, which consumes land, dominates streets and undermines walking and cycling. This also pushes up housing costs, forcing households without cars to subsidise parking through higher prices. The Plan should explicitly link higher density development to lower car ownership, avoid assuming one car per home, and require parking to be optional, generally separated from housing, and transparently priced. Without this, density will continue to be experienced as a problem rather than an opportunity</p>	
<p>The plan predominantly focuses on Cambridge, neglecting over 100 areas in South Cambridge, lacking a clear explanation of how growth in new towns and Cambridge will benefit South Cambs communities.</p> <p>There is no clarity on funding opportunities for infrastructure improvements, including the construction of new schools, doctors' facilities, and road repairs in the SC villages, despite recent big developments in Cottenham for instance</p>	202784 (I Koutoudis)
<p>Comments regarding The Wilbraham's:</p> <ul style="list-style-type: none"> Concern lack of development opportunities around the Wilbraham's. Residents would support land release from greenbelt, if enables refresh the population and try to protect the school from closure. Not opposed to high quality development and community led development schemes such as Community Land Trusts could be used. See having a funding stream and professional support for these types of projects as ways of providing new housing. 	208725, 208726, 208727 (Cllr Matthew Morgan)

<ul style="list-style-type: none"> Concern The Wilbraham's have been ignored in the Local Plan. Support for CIL to spread land value uplift more widely from the large developments favoured by the draft plan. Notes a cycle route to Fulbourn might be a very useful 106, or CIL project for the future for the Wilbraham's. <p>Concern for small villages ability to refresh themselves and draw in new people or allow older residents to downsize and are not adequately reflected in the current local plan.</p>	
<p>Concern proposed green infrastructure opportunity areas unrelated to strategic development allocations that could support their delivery are unlikely to be delivered.</p>	<p>201941 (KG Moss Will Trust & Moss Family), 201966 (Shelford Investments), 202075 (J Francis)</p>
<p>The Housing Delivery Study Addendum (2025) cites particularly high annual build out rates, noting these have previously been achieved due to the continued economic growth within Greater Cambridge. However, it fails to advance any evidence that policy changes will have a material impact on the delivery of windfall sites and therefore it is unclear how this aligns with the requirements of the NPPF. The Councils should consider the potential of omission sites which could facilitate a more joined-up approach to development for the 7,225 homes currently anticipated on windfall sites.</p>	<p>209697 (CEG Land Promotions Ltd)</p>
<p>Land South of New Road, Guilden Morden (site reference 40563), Responder suggests the site should be deemed suitable, available and achievable for the preferred development type.</p>	<p>208672, 208668 (Guilden Morden Developments Ltd)</p>

<p>Supports the identification of the four strategies set out on page 16. Suggest feasibility of the strategies be tested after the assessment of all sites in both Call for Sites consultations, and concern in not including increased development at the Group Village scale, given the sustainability of the settlements within this tier is referenced throughout the evidence base and is not dependent on the presence of a train station.</p> <p>Recommend Policy S/DS be revised at part e, insofar as development in the wider rural area should be inclusive of all sustainable locations, regardless of being beyond the 'Rural Centre' or 'Minor Rural Centre' Tiers.</p>	<p>208674 (Guilden Morden Developments Ltd)</p>
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Green Belt, Grey Belt

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Supports the view that releasing greenbelt or grey belt land is unnecessary to meet development needs, and the importance of preserving the greenbelt for local landscape, nature, health, and recreation.</p>	<p>201547 (Stapleford PC)</p>
<p>Green Belt prevents communities in the environs of Cambridge from merging into one another and with the city. Those purposes are still relevant and justified localised extensions and brownfield sites are compatible in principle with the NPPF.</p>	<p>210983 (C Newell)</p>

Comment that there is plenty of land beyond the Green Belt that is still undeveloped and the new towns and infrastructure being developed can address the forecast economic growth	205656 (M Foote)
The apparent early determination, in advance of the published Green Belt review, that there are no strategic exceptional circumstances to justify release of Green Belt land, and by extension grey belt release for strategic planning purposes, remains a concern.	202627 (British Land)
Objection to Policy S/DS; the supporting text claims the development need does not meet the 'exceptional circumstances' test for Green Belt release, despite NPPF 2024 allowing release where needs cannot be met otherwise. Wrongly treats the need for Green Belt release as 'exceptional'; the exceptional circumstances test should be reassessed given the higher growth evidence.	206093, 206096 (Wimpole Associates Ltd)
Since Cambridge received its £400 million government funding commitment, and with the city's rising profile through the OxCam Corridor project and its promotion as part of the UK's new Biotech "Silicon Valley", pressure on surrounding countryside has intensified dramatically. Private developers and investors are targeting land just beyond the Green Belt, not because it is appropriate or sustainable, but because it is less protected and easier to exploit. The impacts of this on small rural communities like ours are severe, cumulative and ongoing.	209117 (S Hepworth)
National policy does not facilitate the creation of local Green Belt purposes. The Cambridge Local Purposes do not align with the national purposes, particularly Cambridge Purpose 3. This relies on merging of communities (i.e. the necklace	203968 (Anglia Ruskin University)

<p>villages), in contrast to the national purpose which applies to the merging of towns. It is therefore considered that the Development Strategy should rely on a full Green Belt review, assessing land against the applicable national purposes.</p>	
<p>Concerns that as policy states that development needs alone do not justify Green Belt release, and delivery of Policy S/NEC is contingent on relocating the CWWTP, which requires Green Belt land to be removed. The Plan fails to transparently identify and assess this consequential Green Belt impact. The Councils' position that Grey Belt need not be identified because Green Belt is not being released is inconsistent with the Plan's spatial strategy. This lack of transparency undermines soundness and prevents proper consideration of Grey Belt land in accordance with national policy.</p>	202116 (M Asplin)
<p>The Councils' claim in Para 2.64 - that they need not identify Grey Belt land because they make no Green Belt releases - is a fundamental contradiction. Policy S/NEC is "predicated" on a relocation that the made DCO confirms will take 34 hectares of Green Belt. NPPF 148 requires that any Green Belt release must prioritise previously developed and Grey Belt land. By suppressing the relocation's Green Belt impact, the Councils have failed to apply the mandatory sequential tests for Green Belt release, making the plan inconsistent with national policy (NPPF 36d).</p>	202592 (Save Honey Hill Group)
<p>Comments undeveloped Green Belt on the edge of Cambridge is the critical in meeting the fundamental objective of the Green Belt to prevent urban sprawl.</p>	201184 (M Foote)
<p>It is important for the Green Belt Assessment to be updated. An up-to-date Assessment is needed to provide a qualitative assessment of the purposes and functions of the</p>	202736 (Cambridge Past, Present and Future)

<p>Cambridge Green Belt, and given the current pressures and contexts, demonstrate its relevance to the setting of the historic city. The lack of an up-to-date Green Belt Assessment will undermine the plan.</p>	
<p>Objects to Policy S/GB as based on the 2021 Green Belt Assessment and omits Grey Belt criteria; an updated assessment and review of Green Belt boundaries are required. Sites in locations that are defined as grey belt should be strongly considered in order to increase the supply of homes.</p>	<p>206072, 206091, 206105 (Wimpole Associates Ltd)</p>
<p>Comment that the revised Green Belt Assessment has not been published and that the omission of a 'Grey Belt' analysis breaches Planning Practice Guidance; we recommend the assessment be updated to identify Grey Belt land.</p>	<p>206097, 206090, 206089 (Wimpole Associates Ltd)</p>
<p>The evidence produced in support of the GCLP demonstrates that the edge of Cambridge could be a sustainable location for homes and jobs, noting its accessibility to existing jobs and services. Whilst acknowledging that the Councils have to give consideration to the Green Belt, CEG considers that the approach to discounting sites based on Green Belt constraints has significantly hindered the plan's ability to take advantage of the most sustainable development opportunities. These sustainable locations are those which could do the most to help ease transport congestion and their associated environmental pressures by placing growth where there is a very viable alternative to the private car. This runs contrary to the strategic priorities related to climate change, wellbeing, great places and connectivity.</p>	<p>209692 (CEG Land Promotions Ltd)</p>

<p>Policy fails to recognise role of that Grey Belt land could play in assisting to meet employment needs.</p> <p>The Development Strategy Topic Paper (December 2025), in particular Appendix 4, explains why GCSP does not consider exceptional circumstances exist in this instance. However, the evidence base and Sustainability Appraisal consider a series of alternative development strategy approaches to meet identified needs, including use of Green Belt land on the edge of Cambridge.</p> <p>The Topic Paper concludes that Green Belt sites on the edge of the urban area could perform well, but explains that the main disadvantage of such an approach would likely be the significant harm to the Green Belt. However, this conclusion pre-supposes that such sites are Green Belt, rather than Grey Belt land.</p>	<p>211589 (Turnstone Real Estate Limited)</p>
<p>However, there is a danger that in some places the green belt is drawn too tightly around the edges of some villages and thus prevents small-scale appropriate developments that would enhance the environment and provide long-term rural resilience. A sensible, measured engagement should take place over the role of the green belt in relation to smaller village developments.</p>	<p>203071 (Little Wilbraham and Six Mile Bottom PC)</p>
<p>Comments on Green Belt release include:</p> <ul style="list-style-type: none"> Plan correctly states that development needs do not justify further Green Belt release, even with the existing headroom and post-2045 developments. 	<p>201012 (M Colville), 201184 (M Foote), 204642 (C Forbes-Cable),</p>

<ul style="list-style-type: none"> • Two identified sites with exceptional circumstances for Green Belt release are unique and should not lower the bar for future releases. • Supports limited Green Belt release land on the edge of Cambridge to meet the general development needs identified in this plan and it is not necessary for you to identify grey belt land. • Supports conclusion it is not necessary to release Green Belt land on the edge of Cambridge to meet the general development needs identified in this plan and it is not necessary for you to identify grey belt land. • Support the idea of the green belt and your points regarding what the green belt is. However, there are sites that are allocated as green belt that are not in fact but already in the village envelope. These areas of green belt do not tick the boxes of your description of green belt, so I suggest they are released. We have one such site in the middle of a village. It was to be released in earlier stages of this plan but has been removed in this stage. The Walled Garden, Whittlesford CB22 CB280901. Please release it from greenbelt. 	
<p>Responder objects to approach to Green Belt release.</p> <p>CEG highlight that they support the expansion of the Biomedical Campus, but Cambridge has both a booming life sciences sector and tech sector and restricting the release of Green Belt to just enabling the expansion of one existing life sciences operator feels restrictive, and a limiting option in facilitating and realising the undoubted economic growth.</p>	<p>209693 (CEG Land Promotions Ltd)</p>

<p>Green Belt comments at Mingle Lane site:</p> <ul style="list-style-type: none"> • Comments insufficient exceptional circumstances to justify releasing land behind Mingle Lane from the greenbelt. • Support for not including Mingle Lane (S/RHC/HW) in Plan. Housing need can be met by other new substantial developments proposed such as that at Cambourne together with new rural Southern Cluster sites such as those at Spicers, Hinxton and Babraham. • GCLP suggests at para 2.64 that the identified development needs alone are not considered to provide the 'exceptional circumstances' required in national planning policy to justify removing land from the Green Belt, this is based on the presumption that the proposed allocations will deliver as anticipated. • Strong support for retention of land between Mingle Lane, Stapleford and Hinton Way Great Shelford (S/RSC/HW) within the Green Belt, as it is important for the visual and social benefit to the community of both villages. There is no justification to release this land for development. • Concern that land at Hinton Way (Policy S/RSC/HW) is potentially being removed from Green Belt as this would cause irreversible damage and leave the neighbourhood open for developments which could ruin the quality of life. 	<p>201547 (Stapleford PC), 201579 (J Sennitt), 203069 (Pegasus Group), 207497 (A Scott), 208650 (D Morgan), 208651 (D Morgan)</p>
<p>NLHRL contend that the site S/RSC/HW is Grey Belt and given the Government's emphasis of directing homes where they are well related to rail services it should be reallocated for development. The Site Allocations Topic Paper states the Housing Land</p>	<p>208904 (Nightingale Land and Hill Residential Ltd)</p>

<p>and Availability Assessment considers the site as a deliverable option. At paragraph 6.67 it states that the decision to allocate the new settlement at Grange Farm now means that there is a significant allocation in this area and on the route of the Cambridge Southern Corridor transport improvements. It concludes that the Council considers sufficient sites have been identified without the need to release land from the Green Belt.</p> <p>The identification of Grange Farm, whilst located in the southern cluster does not specifically respond to the needs of individual settlements such as Great Shelford and Stapleford.</p>	
<p>Suggests the planned release of Green Belt land at the south of the Nine Wells site is an important green space that campus staff, visitors and hospital patients use increasingly.</p>	201023 (K Mahoney)
<p>Suggests Green Belt in the parish of Stapleford at the tip of the southern tentacle of sprawl heading towards London will be given additional protection to prevent further loss (given the recent hectares lost to development extending the village by over 10%)</p>	201184 (M Foote)
<p>Excluding this accessible site on Green Belt grounds is inconsistent with the Plan's objectives for sustainable rural communities</p>	207434 (KWA Architects)
<p>The development of area land registry ID:CB280901 complies with all outlined requirements and was initially included in the draft plan for Whittlesford but was subsequently excluded.</p>	205412 (L Gardner)

<p>The proposed development meets the criteria for existing infrastructure and transport networks without encroaching on rural green areas.</p> <p>It is a small-scale development that addresses current housing can be quickly built to meet current needs, while preserving the heritage environment with sensitive planning.</p> <p>The development would enhance access to green space for local residents.</p>	
<p>Comments on Parcel H05 include:</p> <ul style="list-style-type: none"> • weak physical distinction from Horningsea, showing site is functionally part of the settlement rather than the open countryside. • backland garden enclosed by residential dwellings, with limited countryside views and dominant urbanising influences, making it unsuitable for Green Belt protection. • a limited or no contribution to Green Belt Purposes 1-3, release would have a minor impact on the adjacent Green Belt. • current Green Belt boundary is arbitrary, bisecting a single planning unit and lacking permanent, recognisable features as required by NPPF 149(e)-(f). • Aligning Green Belt boundary with Defined Development Extent would resolve the policy tension noted in paragraph 2.136 of Policy S/DE. 	<p>206080, 206081, 206082, 206083, 206084, 206085, 206086, 206087 (M Asplin)</p>

<ul style="list-style-type: none"> • Sustainable location with active-travel links, a suitable small-site that could help meet the Council's 6.5 % shortfall in small sites. • Removing the parcel from the Green Belt would support the vitality of Horningsea village, aligning with NPPF paragraph 83 which the current Development Strategy fails to address. 	
<p>The Consultation Draft NPPF (2025) sets a clear intended direction of travel within Policy GB3(1a) which notes Green Belt boundaries should be altered through the preparation of Local Plans where this would enable the development of land around stations. Whilst until the Draft NPPF (2025) is adopted it will carry limited weight and the Greater Cambridge Local Plan is to be examined against the NPPF (2024), GCSP should consider the intended direction of travel for future policy and consider land (including Green Belt land) for allocation that is well connected to train stations.</p>	<p>211531 (Corpus Christi College, Cambridge)</p>

Gypsies, Travellers and Travelling Showpeople, Residential moorings for boat dwellers, Other caravan dwellers, Specialist accommodation

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Comment that the plan is likely to provide over and above the identified need for travellers within the plan period.</p>	<p>208494 (Central Bedfordshire Council), 207655 (Cottenham PC)</p>

<p>Comment that optimisation and intensification of the existing sites at Chesterton Fen Road and Smithy Fen is iniquitous and unfairly discriminates against all the residents of Cottenham (and Chesterton), including those residents on the Smithy Fen site, and will place an increased and unfair burden on the village.</p>	<p>207655 (Cottenham PC)</p>
<p>Careful consideration needs to be given to any planning at the Smithy Fen site.</p>	<p>203867 (J Welford)</p>
<p>Object to Policy S/AMC/GT, optimisation of Gypsy and Travellers sites. Smithy Fen is already overcrowded and unsafe. The site opposite is an eyesore on the countryside. Traffic levels are already high on a single track road with passing places. Local doctors are overstretched. Why does Smithy Fen need to grow when new sites like Northstowe and Waterbeach do not have Traveller sites.</p>	<p>208496 (L Gardner)</p>
<p>The proposed increase in Traveller settlements in South Cambs without justification, especially when Cambridge has more infrastructure and amenities, is extremely controversial. What is the contribution of such sites in the local community and economy?</p> <p>What is the necessity of intensifying Traveller sites in Milton and Cottenham, when these locations exceed appropriate size and are remote, leading to safety concerns for residents. The already proposed new settlements far exceed the ANA report requirements of 159 spots.</p>	<p>202784 (I Koutoudis)</p>

Infrastructure

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>New healthcare infrastructure delivery is resource intensive, and funding constraints from the NHS are worsened by population growth from housing developments.</p> <p>New developments should proportionately contribute to the healthcare needs arising from increased population due to housing growth. Healthcare infrastructure should be prioritised in infrastructure delivery due to its strategic importance in supporting housing growth and sustainable development.</p>	<p>205050 (NHS Cambridgeshire and Peterborough Integrated Care Board)</p>
<p>The Local Plan has a role to make it clear that there is a requirement for development contained within the Plan to help fill funding gaps in the delivery of transport infrastructure. The GCP schemes, as already discussed, are heavily relied upon within the Plan. Whilst the GCP programme has funding, it is predicated on match funding for infrastructure and therefore developers benefitting from such infrastructure will be expected to contribute proportionately towards schemes that serve their sites. As a result, obligations for both infrastructure and for commuted sums for maintenance should be factored into the Infrastructure Delivery Plan and associated sites within it.</p>	<p>210516 (Cambridgeshire County Council)</p>
<p>The aim that development will only be allowed if it is accompanied by the right infrastructure that will deliver the range of supporting services, facilities and</p>	<p>210984 (C Newell)</p>

infrastructure that workers, visitors and residents need is crucial to protect the three strands of sustainability	
<p>Concern over the lack of infrastructure to support the proposed development:</p> <ul style="list-style-type: none"> • Especially schools, medical facilities and qualified medics, community facilities, transport, and increase in people, vehicles, pollution. • Lacks clarity on the infrastructure required to support development on the edge of Cambridge (CSET and Busway identified as critical infrastructure in the Infrastructure Delivery Plan but not explicitly referenced within Grange Farm and the Cambridge Biomedical Campus expansion policies. 	201172 (J Lambert), 207533 (S Berridge), 203894 (KWA Architects)
Notes the key importance of infrastructure coming forward in time to support new communities and being rigorously enforced.	202820 (Cllr K Porrer)
Concerns plan appears overly optimistic about infrastructure project timelines and lacks a clear funding strategy for necessary water infrastructure.	202214 (A Sykes)
Concern infrastructure required to support population growth may not be deliverable through the development process alone and will need significant additional investment from external sources. Such as healthcare infrastructure, noting that a replacement for Addenbrookes Hospital could require £2.2 billion. There is a concern that without adequate capacity, economic growth could lead to social and environmental decline, resulting in unsustainable development.	202897 (Cambridge Past, Present and Future)
Section 4.3 of the Infrastructure Delivery Plan ('IDP') sets out the priority projects. The Cambourne to Cambridge ('CtoC') bus link is identified in Table 4-1 as a strategic	203440 (Juniper Propco)

<p>transport measure. It is unclear in its wording whether it is anticipated it will be delivered by 2035. Clarification should be provided regarding the anticipated timescales within which CtoC will be delivered. This may become clearer prior to the Regulation 19 version of the plan being produced</p>	
<p>Recommends Grampian conditions should be considered to ensure healthcare infrastructure is built in a timely manner.</p>	202214 (A Sykes)
<p>Concern Plan overlooks the post-16 education system that sustains that workforce. Families drawn by opportunity also prioritise high-quality 16–19 provision, and Cambridgeshire's specialist tertiary model—including institutions such as Hills Road Sixth Form College—needs to be brought into scope. Post-16 places require long lead-in times, suitable sites and coordination with the Department for Education therefore capacity cannot be flexed quickly. Without explicit recognition in policy, site safeguarding and proactive planning with providers, the proposed housing and jobs growth will become unbalanced, constrain parental choice and weaken the skills pipeline. To be deliverable, the Plan must treat post-16 education as critical infrastructure.</p>	202854 (Hills Road Sixth Form College)
<p>Comments regarding the Infrastructure Delivery Plan include:</p> <ul style="list-style-type: none"> • Comments transport inadequate in South Cambridgeshire, noting Great Shelford, requires improvement alongside new projects, as highlighted in the draft Infrastructure Delivery Plan. 	202214 (A Sykes), 202433 (The CLC Trust)

<ul style="list-style-type: none"> • Concerns that the draft Infrastructure Delivery Plan fails to mention need for a new acute hospital to meet the healthcare demands of the growing population. • Concerns over uncertainty in the infrastructure delivery timetable for expanded developments like Cambourne and Grange Farm 	
<p>Some flexibility will be needed to meet unexpected events, outcomes or dependencies on infrastructure projects which may or may not be delivered.</p> <p>Most notably, in August 2025 the Government announced that it will not be funding the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) creating uncertainty as to whether Councils' vision for North East Cambridge can be taken forward.</p> <p>We appreciate the purpose of plan making is to have a “plan-led” system, building in as much certainty as possible as to where development and infrastructure should take place over the plan period. However, as the GCLP has already witnessed unforeseen events along the way can impact on the development strategy, and some key sites are dependent on major infrastructure being funded and implemented.</p>	211423 (Gonville & Caius College)
<p>The Plan's housing supply position indicates that, excluding the North East Cambridge allocation (which is surrounded by uncertainty given its reliance on the relocation of the Cambridge Waste Water Treatment Plant (CWWTP) and funding to do so which was withdrawn by Government in August 2025), the Councils are planning for only a modest level of flexibility above the identified housing requirement.</p>	210224 (Vistry Group)

Should funding be secured to enable full delivery at North East Cambridge, this headroom would increase, but it remains contingent on factors outside the Councils' direct control.	
Para 2.79: Healthcare infrastructure and, in particular, the necessary new acute hospital must be included in this paragraph. GCSP should also consider whether Grampian conditions could be applied to a failure to build appropriate healthcare infrastructure. If not, some other mechanism will be needed.	210891 (Great Shelford PC)

Water supply, drainage, waste water and flood risk

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
When Anglian Water submitted our Business Plan to Ofwat in 2023, the framework was not designed to account for the pace and scale of growth outlined by the government in the "Realising the Full Potential of Greater Cambridge" statement, and the subsequent change to the standard method for calculating local housing need in the National Planning Policy Framework and Planning Practice Guidance updates (December 2024). This means that the scale of growth funded in our AMP8 Business Plan, does not sufficiently reflect the scale of growth pressures or the level of funding to address them.	209157 (Anglian Water Services Ltd)
It is noted that the preferred option for the spatial strategy is identified as a blended option, underpinned by development strategy principles. These principles align with	209159 (Anglian Water Services Ltd)

<p>Anglian Water's strategic long- term ambitions to be resilient to the risk of drought and flood, a carbon neutral business, enabling sustainable economic and housing growth, and working with others to achieve significant improvements in the ecological quality of catchments in our region.</p> <p>We support the development management principle that necessary utilities should be supported in a sustainable way so that the environment is protected and enhanced. We consider this principle is fundamental to supporting sustainable and resilient growth, and to enable investment to be brought forward to address the considerable growth being planned for the Greater Cambridge area, whilst ensuring the environment is protected.</p>	
<p>Anglian Water notes that the Development Strategy for Greater Cambridge directs growth to the most sustainable locations, with the focus on the Cambridge urban area, Cambourne, other new settlements and the rural southern cluster which has strategic transport links and employment opportunities. Anglian Water recognises that nationally strategic infrastructure projects such as the A428 Black Cat to Caxton Gibbet upgrade and East West Railway are catalysts for sustainable connected growth across our region and together with three planned busways into Cambridge, have shaped the Development Strategy for Greater Cambridge.</p> <p>The key sites within the Cambridge urban area, and on the edge of Cambridge (a and b) includes North East Cambridge. It is noted that the policy (2.a.i) provides flexibility for</p>	209158 (Anglian Water Services Ltd)

the type of development indicated for this site, as a result of the Government's withdrawal of funding for the Cambridge Waste Water Treatment Plant Relocation (CWWTPR) in August 2025, following Development Consent Order approval for the scheme in April 2025. Anglian Water considers that this flexibility for development of the site is important, because of the investment now required to address capacity at the existing Cambridge WRC.

i./iii/v For new settlements, there is a considerable expansion at Cambourne North to link with a new proposed East West Rail station and the carried forward allocations at Bourn Airfield and Northstowe. The growth at Cambourne, has and continues to be considerable. Both Cambourne and Northstowe are within the Uttons Drove WRC catchment, which is being considered as part of our longer-term planning for the 2025–2030 asset management period (AMP8) and beyond. In line with PR24 adaptive planning principles and our ongoing discussions with Ofwat, we are reviewing growth forecasts across our operating areas and developing options on how to approach investment that can respond to uncertainty in the scale and timing of development. Any future investment at Uttons Drove would contribute to additional capacity and resilience within the catchment; however, it is unlikely that this alone would accommodate the full scale of growth currently proposed. Supporting later phases of development at these locations will therefore require a longer-term strategy, progressed through future

<p>planning and price review cycles as growth assumptions are refined and investment needs are confirmed.</p>	
<p>Comments that growth cannot happen until there is a water supply solution:</p> <ul style="list-style-type: none"> • Assertion that there will be enough water for the expanded population is a joke. • New reservoirs are being built but there is uncertainty how these will be filled. • Concern the scale of growth is placing further unsustainable demands on water resources to detriment of already depleted chalk aquifer and degraded chalk streams, until Fens reservoir (late 2030s) and pipeline (2032) are in place. 	<p>201223 (S Williams), 202438 (A Fisher), 202484 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)</p>
<p>Environment Agency notes:</p> <ul style="list-style-type: none"> • in the policy’s Supporting Information on “Ensuring a deliverable plan” mentions “is not anticipated to be completed in the housing trajectory accompanying the Local Plan until 2032” - We would recommend the statement “is not anticipated to” to be improved by including further information from developers of the strategic sites on their planned phasing. • Environment Agency recommends in table 2 highlights Allocations for the periods ‘Homes 2024-2025’ and ‘Homes Post 2045’. We recommend this table be revisited and an additional column be added which details new local plan allocations for ‘Homes 2024/25-2031/32’ and ‘Homes 2032/33-2045’ (or any further breakdown, that reflects when water supply is planned to be available from other strategic schemes like the Fens Reservoir). 	<p>211127, 211128, 211129, 211130 (Environment Agency)</p>

<ul style="list-style-type: none"> • Environment Agency are encouraged by the statement “Delivery and phasing plans will need to demonstrate engagement with the water industry, and respond the availability of water supply improvements.” and would recommend including this wording to this policy or to policy CC/WE. • Environment Agency recommends in paragraph 2.86 appears to be missing the word ‘waste’ before ‘water treatment works’, in the first sentence. We recommend being clear throughout the Plan when referring to Waste Water Treatment Works, to avoid confusion with Water Supply Treatment Works, which are commonly referred to as just water treatment works. 	
<p>We note the proposed new pipelines to alleviate the shortage of drinking water and the proposal to reduce extraction from the aquifer and particularly chalk streams, both of which we strongly endorse. However, it is our understanding that there is a delay in the availability of water from Lincolnshire using the new pipeline until after 2030. How will this gap be managed and what is the impact of this on the plan period?</p>	203264 (Horseheath PC)
<p>Questions where sewage works are to support this plan?</p>	202282 (L Turton)
<p>Concern over both lack of water and flooding which made worse by development over fields and flood plains.</p>	202282 (L Turton)
<p>Concern any increase in flooding due to A428 is being widened is taken into account.</p>	201682 (S Smith)
<p>Comments on environmental resources (green spaces and water) are at their limit. No credible solutions provided where the resources will come from, and what will be done to restrict demand and usage.</p>	205438 (A Kirchgaessner)

<p>We do not share the optimism expressed in Paragraph 2.84: Cambridge Water Supply Area Evidence prepared for GCSP does not highlight that the Grafham Transfer is a key dependency. Cambridge Water’s WRMP24 refers, in relation to the Cambridge Water Recycling Centre effluent re-use scheme. The IDP states opportunities for a new surface abstraction from the River Cam. The Cam runs through the parish and this strikes us as unlikely. The evidence report also refers to water credits that the Government has said nothing publicly about since March 2024. It would surely be preferable to seek urgently to solve the problem identified in the evidence that water reuse and recycling for large new development sites may be an option.</p>	<p>210892 (Great Shelford PC)</p>
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Transport

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>In broad transport terms CCC supports the Local Plan and the associated development strategy. The transport evidence developed to date alongside the development strategy demonstrates that the Local Plan is deliverable in transport terms, if sufficient mitigation of the key development locations is provided. It is however important to state that all the strategic sites contained in the draft Local Plan require transport mitigation strategies to support their delivery. This mitigation includes stringent trip budgets which are to be agreed with CCC as Highway Authority. In addition, the transport infrastructure</p>	<p>210513 (Cambridgeshire County Council)</p>

requirements for each of the strategic sites are significant, therefore deliverability and viability will be key considerations. CCC would re-emphasise that in transport terms, the strategic sites are heavily reliant on the GCP programme of works being delivered.	
The development of the Greater Cambridge Transport Strategy (led by the Cambridgeshire and Peterborough Combined Authority) will provide the transport Strategy to support the Local Plan. The Council is working with the CPCA to support this process. The draft Local Plan makes several references to City Access (e.g. Figure 13). This workstream has been superseded by the forthcoming Greater Cambridge Transport Strategy.	210514 (Cambridgeshire County Council)
In relation to the point made about viability and infrastructure requirements to ensure a development site is deliverable, it is essential to recognise that whilst CCC agrees that the Grange Farm site can be delivered in transport terms with sufficient mitigation, it is only deliverable if CSETS phase 2 is built as well as an extension to CSETS with grade separation over the A11 into Grange Farm, with bus priority across a new junction on the A1307. This is a significant and complex infrastructure requirement. Grange Farm would benefit from a detailed transport strategy to set out the full transport mitigation package, as is the case with Cambourne and other strategic sites.	210515 (Cambridgeshire County Council)
Comment that is important that the Greater Cambridge Transport Strategy is available as the plan progresses	207534 (East Cambridgeshire DC)
Comments regarding the Transport Evidence Report	211765, 211766 (Camcycle)

<ul style="list-style-type: none"> • Helpfully shows that development in Cambridge and on the edge of Cambridge generates far fewer additional car trips per home or job than remote new settlements, and has dramatically lower car mode share. • largely relies on ‘predict and provide’ modelling, testing conservative assumptions and then seeking mitigation, rather than exploring what could be achieved through stronger policy requirements and place-based design. • makes comparisons between sites such as Grange Farm, Waterbeach and Northstowe that do not reflect the different delivery mechanisms and constraints that will shape real-world travel behaviour 	
<p>EWR Co strongly support the Council’s growth strategy (Policy S/DS) which is ‘heavily informed’ by the location of existing and proposed public transport schemes, including EWR. The EWR project will play a major role in helping the Councils achieve their ambitions for Greater Cambridge by 2045.</p>	209085 (East West Rail Company)
<p>Comments not sensible on the plan ahead of the Combined Authority’s Travel Strategy</p>	201902 (C Deer), 202118 (Elsworth PC)
<p>Concern Plan cannot be properly considered without the Greater Cambridge Transport Strategy, given implications of substantially higher levels of commercial and private transport journeys and condition of local roads, and the Infrastructure Delivery Plan.</p>	201913 (R Baker)
<p>Recommendation for appropriate transport and travel modelling to mitigate potential negative impacts on travel towards Cambridge from Huntingdonshire.</p>	201657 (Huntingdonshire DC)

Mitigation proposals should encompass various travel modes and maximise opportunities for Huntingdonshire residents and businesses to access public and active transport.	201657 (Huntingdonshire DC)
Ultra-fast and efficient public transport links from 'spokes' into the Cambridge (the hub) would minimise congestion and journey times.	201920 (A Davidson)
Recommends a future light rail network linking up larger villages and new towns with Cambridge and each other. Locating facilities close to stations.	202362 (A Carpen)
Concern at over-expansion of local economy and move toward sustainable transport.	201223 (S Williams)
Argues that public transport and active travel must be the starting point for all development, with properly designed, networked routes to avoid car dependency and ensure use.	201734 (R Stobbart)
<p>Comments as new housing is out of Cambridge, but people work mostly in Cambridge, transport will be more stressed, and sustainable travel modes have not been consistently included.</p> <ul style="list-style-type: none"> • The Plan should map where homes are built and where employment is located, to see the needs for transport. • Included more detail on supporting public and active transport between settlements and the city, between settlements and Policy for local amenity within settlements to assist with day-to-day travel within the communities • Add policy to support active travel within new communities and retrofitting to existing settlements. 	201812 (J Baumberg), 201826 (T McKoewn)

<p>The plan should have binding targets for the proportion of journeys walked/cycled and by public transport and for reduction in car ownership (and car dependency). Major developments should have targets for mode share and permeability.</p>	<p>202283 (A Lawrence)</p>
<p>Higher-density development should be linked to lower car ownership and strong alternatives to driving to support sustainable travel.</p> <p>Current dense developments often include high levels of private parking, which affects land use and increases housing costs for non-car owning households.</p> <p>The Local Plan should require parking to be optional, separated from housing, and transparently priced to ensure density is viewed positively.</p>	<p>204632 (M Fordham)</p>
<p>Reduce reliance on the private car:</p> <ul style="list-style-type: none"> • Reduce the dependence on cars for village residents • Public transport to villages needs to be significantly improved 	<p>201894 (R Pargeter), 201023 (K Mahoney)</p>
<p>Recommends increased importance on sustainable transport. Privately-owned electric vehicles do not solve other problems; are expensive way to reduce carbon; are not a sustainable solution.</p>	<p>202283 (A Lawrence)</p>
<p>Comments strategy underplays the role that the existing public transport network can and should play in delivering sustainable development.</p>	<p>203069 (Pegasus Group)</p>

<p>States that the planned Cambourne rail station will adversely impact Boxworth, with inadequate road infrastructure likely to turn the village into a major access route, causing significant detriment.</p>	<p>202838 (W Nichols)</p>
<p>Comments in relation to the CSETS transport corridor scheme:</p> <ul style="list-style-type: none"> • Supports improvements to transport corridors, pivotal to transport strategy, but concerns over the proposed CSET route, failing to use existing transport corridors and for cutting through Green Belt land. • Comment that the Better Ways for Busways has proposed an alternative to the CSET scheme utilising the existing transport corridor, with less environmental impacts, more accessible, and more cost efficient. • Proposed CSET busway is not compliant with upgrading EXISTING transport corridors. Abandon this hugely destructive and unnecessary scheme, instead improve the frequency and affordability of buses running on the existing roads. • Objection to CSET route and questions if multi-modal access road is needed if the Better Ways for Busways' alternative for a busway spur off the A1307 Hinton Way roundabout was adopted. • Figure 13: is potentially misleading. CSET proposals are still at Inquiry, it is not a committed scheme but a proposed scheme. 	<p>203087 (N Campbell), 210184 (Historic England), 204099 (A Baker), 207656 (K Foreman), 202617 (P Waters), 201547 (Stapleford PC), 203174 (D Morgan), 207533 (S Berridge), 204944 (C Arthurs), 204942 (O Arthurs), 204758 (M Fyfe), 204448 (N Pond), 203180 (D Morgan), 209022 (Hobson's Conduit Trust)</p>
<p>Questions proposed multi-modal access road from Granham's Road to the Cambridge Biomedical Campus (CBC), suggesting alternative busway spur from the A1307 Hinton Way roundabout be considered.</p>	<p>204107 (A Baker)</p>

Concern Plan takes no account that by 2045 most vehicles will be EVs.	201902 (C Deer), 202118 (Elsworth PC)
Concern regarding transport improvements, with the draft Infrastructure Delivery Plan not acknowledging existing transport network condition needing to be addressed. While the development of Cambridge and CBC offers potential opportunities for residents of Great Shelford in employment and healthcare, the village carries many of the major transport routes in the South Cambridge area and bears the brunt of their ongoing development.	208089 (Great Shelford PC)
<p>We have concerns about amount of growth on the northeast and eastern sides of Cambridge, and recreational pressure on our sites arising.</p> <p>It is acknowledged that the Local Plan is informed by the location of existing and committed public transport schemes and that a Transport Strategy is being prepared by the CPCA. However, the National Trust has the Wimpole Estate, Anglesey Abbey and Wicken Fen which are important heritage, greenspace and tourism facilities for its residents and visitors. Their importance to Greater Cambridge should not be undervalued. All three of these sites are poorly connected to the city and to the proposed strategic development sites, with very limited opportunities to access the sites by sustainable transport modes. This is an issue that the National Trust are very keen to address but cannot do this in isolation. We are keen to work with other stakeholders and partners to seek opportunities to improve these links.</p>	211081 (The National Trust)
Comments on roads conditions, access, use and safety include:	202214 (A Sykes), 202282 (L Turton)

<ul style="list-style-type: none"> Highlights problem areas: (A1301), level crossings, and poor road surfaces to enhance transport safety and accessibility for cycling. <p>Concern over capacity of rural and major roads with increased usage.</p>	
<p>Concern for A14 congestion at peak times at M11 pinch point, and limited input from highways agencies on traffic impact of developments?</p>	201322 (R Morley)
<p>Concern no indication of the East/West railway is included as line of it is incorrect and therefore the local plan.</p>	201682 (S Smith)
<p>Concerns the environmental impact of the East West Rail's southern approach, regarding local wildlife and the Mullard Radio Astronomy Observatory.</p>	202214 (A Sykes)
<p>Concern that in villages car transport will have to remain a mainstay of local transport, and with move to electric vehicles, the plan needs to ensure that the electricity supply infrastructure is sufficient to meet this need.</p>	201894 (R Pargeter)
<p>Comments regarding CSET include:</p> <ul style="list-style-type: none"> Objection to CSET route as not within a public transport corridor. Better Ways for Busways proposed an alternative route along A1307, which does not cross greenbelt land. Offers additional evidence supporting the benefits of the proposed on-road route. Alternative route would be less environmentally destructive, improve accessibility for a range of users, and cost-efficient. <p>Plan should be scrapped and a new plan created which looks at taking the busway alongside the road.</p>	202620 (I Smith), 202684 (J Hunting), 203051 (C Schofield), 203126 (J Jasiewicz), 204085 (J Robinson), 208405 (M Cooper)

Strategic cross boundary matters

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Concern level of growth detrimentally impact on neighbouring areas to meet and deliver their own economic ambitions and growth aspirations.	208495 (Central Bedfordshire Council)
SCC understands from the settlement strategy and allocations that there is a low level of windfall and allocated growth in the area of South Cambridgeshire that directly affects our border. Our comments relate to highways and transport; minerals and waste planning, and education issues. Our officers would be happy to further engage with you as your plan progresses.	210629 (Transport 2000 Cambs & W Suffolk)
Given their proximity to Essex it is essential that Greater Cambridge councils work collaboratively with ECC and other partners, to ensure consideration is given to the cross boundary impacts and connectivity within Essex, in particular highways and transportation, Early Years and Child Care, Education and Adult Community Learning.	210471 (Essex County Council)
ECC notes that the Greater Cambridge Local Plan proposes “six new development strategy choices not considered for previous plans, which form geographically focused hybrids of the previously identified sources of supply”. ECC welcome joint working to ensure consideration is given and actively planned to ensure accessibility and connectivity to key services and facilities that will benefit Cambridgeshire and Greater	210472 (Essex County Council)

Essex residents, visitors and those investing in these localities. This is particularly important given ECC's role as a neighbouring infrastructure and service provider.	
Comments where opportunities to review any cross-boundary site allocations, Hertfordshire County Council should be invited to engage and contribute on matters relating to service provision across administrative areas to ensure there are comprehensive mitigation strategies	204034 (Hertfordshire County Council)
Responder questions Plan's discordance with approaches set out emerging Peterborough Local Plan and Huntingdonshire Local Plan points to a failure to cooperate and align with neighbouring local authorities, which must be addressed to enable the storage and distribution sector to thrive in accordance with market conditions, and the NPPF.	211686 (Newlands (Cambridge) Limited)

Document presentation / content

Summary of issues raised in comments	Comments highlighting this issue
Key elements of the evidence base underpinning the Development Strategy lack sufficient transparency at Regulation 18 stage, including the absence of recorded outcomes in Defined Development Extents Review Appendix C, and limited explanation of how site information has been interpreted in HELAA and Green Belt assessments. This restricts meaningful engagement on reasonable alternatives. The Council is requested to ensure that assessment outcomes and reasoning are clearly documented prior to Regulation 19 to support an effective and justified plan-making process.	202449 (M Asplin)

Figure 9, page 59 of the draft plan missing a symbol for the Cambourne North proposals? Four locations are identified but there are only 3 symbols on the map	208506 (Central Bedfordshire Council)
Concern Polices Map not showing defined green separation zones on the Policies Map (between Northstowe, Oakington and Longstanton), lack of clarity undermines the effectiveness of the Development Strategy. The Plan should explicitly designate and protect green separation on the Policies Map.	204372 (Cllr T Bygott)
A clear diagram showing the spatial and temporal distribution of employment growth, using the same geography and timeframes as Figure 12, is essential to assess whether homes and jobs are being planned in the same places and to properly understand the transport implications of the spatial strategy.	211767 (Camcycle)
Figure 13 - The figure is potentially misleading. The CSET proposals are still at Inquiry, it is not a committed scheme but a proposed scheme. We recommend that you amend status of CSET to proposed, not committed.	211976 (Historic England)

Objection sites

Summary of issues raised in comments	Comments highlighting this issue
Whilst we support the overall inclusion of sites at part e) of the strategy, we do not consider that sufficient sites in such locations have been considered as part of the evidence base and therefore included within the Plan. This is the case for the land opposite Brewery Road, as discussed in relation to the HELAA 2025 above. This site is	211270 (Mr & Mrs Smith)

<p>within the Southern Rural Cluster, adjoining a Group Village (where one allocation is proposed) with good public transport links. Despite this, it was excluded from assessment within the HELAA 2025.</p>	
<p>Objection as an infill site in Whittlesford should be included in the Plan, walled Garden, Whittlesford CB280901 for 8 homes, as rural villages on the edge of Cambridge.</p>	<p>204433 (C Forbes-Cable)</p>
<p>Cambridge Science Park North Supports inclusion of Cambridge Science Park North as will generate around 3,500 skilled jobs and at least 460 training and apprenticeship places in science, technology and mid-tech sectors.</p>	<p>203242 (Cambridgeshire Chambers of Commerce)</p>
<p>The existing Cambridge Science Park is of national significance, the first of its kind, it has fostered collaborative working across the UK tech and life sciences sectors both within Cambridge and nationwide. It attracts top-tier global tech companies due to its enduring competitive global brand. It forms part of the Oxford-Cambridge Arc and the innovative growth corridor between London, showing its location as an area of high quality provision for the science and technology sector.</p> <p>Not only is there a high prevalence of research and development facilities linked to skilled manufacturing already at Cambridge Science Park, it is also home to some of the more exportable subsectors within this employment sector. Cambridge Science Park has considerably higher exportability than the national average in both high-tech and</p>	<p>211482 (Trinity College (CSP) Limited)</p>

<p>mid-tech sectors. Evidence to date would suggest that establishing standalone sites further out of the City do not work; If we do not provide these facilities in Cambridge, these companies may choose to locate operations outside of the UK altogether.</p> <p>There is every intention that the provision at Cambridge Science Park North (HELAA Reference 40096) will match and elevate Cambridge's global position.</p>	
<p>Cambridge Junction's future redevelopment and reprovision, and the detailed implications of the Draft Local Plan, have only become clear at Regulation 18 stage. In addition, the Create Cambridge Insights Report has only recently been completed and provides a new evidence base on cultural infrastructure need and delivery. This representation therefore responds to newly available information, site allocations and evidence.</p>	204806, 204802, 204826 (G Shaw)
<p>The Gt Shelford Site 115766 access assessment remains unchanged with a RED rating, but the respondent argues it should be upgraded to GREEN based on a full transport assessment, access is suitable for emergency services, sustainability, no harm to nearby heritage assets, low flood risk, indicating access is suitable for development, and re-evaluated to GREEN due to a reduction in proposed residential units. The respondent asserts it should reflect a more appropriate GREEN score based on the evidence submitted.</p>	204933 (Great Shelford (Ten Acres) LLP)
<p>The site at Land South of Shelford Road, Fulbourn, should be included in the Plan to enhance housing variety, as it is in a sustainable location with access to local facilities</p>	204941 (Miller Homes)

<p>and public transport on the edge of Cambridge Centre. The land adjoining Land South of Shelford Road Fulbourn site could also be included in the Plan for further housing development, promoting comprehensive development and a natural edge to the village.</p>	
<p>Suggests Grange Farm is not a sustainable solution for AvTech workers and given the Plan recognises IWM Duxford as an AMC, the Plan should recognise and make provision for housing for the new AvTech workers.</p> <p>Responder states Maarnford Farm is the last development parcel identified in Duxford, meeting some immediate housing need but will not address the medium to longer term need, including the AvTech workforce. Suggests a new masterplan led plan is required to facilitate sustainable growth in Duxford.</p>	<p>211426, 211427 (Gonville & Caius College)</p>

Comments on the Housing and Economic Land Availability Assessment

Summary of issues raised in comments	Comments highlighting this issue
<p>There are conflicts in the Urban Intelligence reports on Sites and factual errors should be corrected. The reports are not up to date regarding build-outs. The section Category of Settlement treats sites outside the settlement boundary as being the same as sites adjacent them. In policy terms they are very different and therefore it should be clear when a site is within the defined settlement development boundary and when in countryside. Flood Risk RAG zones do not agree with historic and/or current flooding</p>	<p>211930 (C Newell)</p>

and previous Local Plan Flood Zones. Archaeology RAG Assessments should identify where excavations are partial and a full build-out would affect areas not assessed.

Policy S/SH: Settlement Hierarchy

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was general support for the policy citing reasons including provides a clear structure for directing development and helps prevent speculative development in the least sustainable places. Others commented that boundary extents were too restrictive and limited growth in rural locations and smaller villages. Some considered the approach did not reflect draft National Planning Policy, some requested wording changes, whilst others questioned whether the policy was contrary to the current NPPF.

A number commented on the lack of a review of settlements' capacity.

Anglian Water asked that the policy make clear that that the requirement for adequate infrastructure to be able to be made available should be applied to growth at smaller settlements including Minor Rural Centres, Group Villages, and Infill Villages. The Environment Agency asked that "and areas of flood risk are avoided" be added to the policy.

Some comments queried the approach taken in the Settlement Hierarchy Study, including to revise the settlement hierarchy methodology to ensure consistent and transparent comparison between Group Villages. A suggestion was made for a more comprehensive review of settlements and their role within the wider settlement hierarchy, noting the relationship between settlements, and taking into account committed and proposed growth, improved connectivity and changing functional relationships.

A significant number of comments proposed amendments to the categorisation of specific settlements where they considered settlement to be suitable for a different tier due to scale, infrastructure, services or sustainability. The promoter of a site on the edge of Royston recommended designation within the hierarchy.

A possible draft Policy S/SH Discrepancy with the housing requirements is responded to in the responses to Appendix D.

Response to main issues:

Comments supporting the policy approach are noted.

The Settlement Hierarchy policy forms one part of the development strategy, which has carefully considered the approach to directing development to sustainable locations. National policy and the Local Plan including policy S/SH directs growth to those settlements which can support most growth sustainably. Rather than considering the capacity of each settlement, the Councils consider that the proposed policy approach provides a clear policy framework informing an appropriate response to planning applications ensuring that they can be considered on their own merits.

Some comments also referenced the draft NPPF proposal for flexibility at railway stations, suggesting greater account is taken of them in informing the hierarchy. The outcome of that consultation is not known. The location of railways stations is a factor in the scoring of settlements in the Settlement Hierarchy Study.

The policy has been amended to make clear that the requirement for adequate infrastructure to be able to be made available should be applied to growth at smaller settlements, in response to Anglian Water’s representation. The requirement to avoid flood risk was not added noting that this national policy requirement would be addressed via other policies in the Plan.

The Councils consider that the Settlement Hierarchy Study 2025 remains a robust and proportionate evidence base for informing the Proposed Submission Settlement Hierarchy policy. The categorisation of settlements in a particular hierarchy category within the Settlement Hierarchy Study is a matter of judgement, drawing on, but not being wholly defined by, the sustainability scoring. While the scoring itself did not account for the interaction of settlements, the rationale for categorisation of settlements did include this consideration where relevant. It is considered that adding specific scores for relationship with other settlements would form an overly complex methodology. The scoring itself is based on a rounded assessment of services and facilities.

The Councils have considered all settlement specific representations that were received during the Draft Plan consultation. However, based on review the Councils consider that the categorisation of settlements in that Settlement Hierarchy Study remains robust, and that there is no need for further modifications to any settlement’s position in the hierarchy from that proposed at Draft Plan stage. Consideration of Royston’s role in relation to the Greater Cambridge development strategy is addressed within the Strategy topic paper.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Comments supporting the policy includes: <ul style="list-style-type: none"> • broad support for policy 	202613 (Ickleton PC), 201377 (Gamlingay PC), 202734 (Cambridge Past, Present and Future),

<ul style="list-style-type: none"> • provides a clear structure for directing development • helps prevent speculative development in the least sustainable places. • for group villages to have no more than 8 houses per scheme • appropriate Cambridge identified at top of the hierarchy • support for the Towns to have own position in the hierarchy • support for Cambourne defined as a town, along with Waterbeach New Town and Northstowe • inclusion of Great Abington and Little Abington in Group Villages • appropriate for Swavesey to be defined as a Minor Rural Centre • support for designation of Ickleton as an Infill Village. • growth to be directed to Great Shelford and Stapleford recognising position in hierarchy and the number of services and facilities within the settlement. • support for Willingham defined as a Minor rural centre • proportionate distribution of growth is important to ensure that settlements – both large and small – remain sustainable and that growth takes place in locations which can support it • support for Meldreth defined as a Group Village • support the proposed overall policy for minimal development in small villages in rural South Cambridgeshire in preference for larger new centres that are already being established 	<p>204142 (Richborough), 204167 (Tritax), 205121 (North Barton Road Landowners Group), 204577 (C Forbes-Cable), 201767 (C Blakeley), 203315 (J Manning), 210666 (Gladman Developments), 209134 (Meldreth PC), 208905 (Nightingale Land and Hill Residential Ltd), 203267 (Horseheath PC)</p>
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<ul style="list-style-type: none"> • Anglian Water is generally supportive of the approach set out in the policy, and the provisions setting out the parameters for growth in each settlement category. It is noted that for Cambridge, Towns and Rural Centres the policy is clear that development should come forward (without any limit imposed) "provided that adequate services, facilities, and infrastructure are available or can be made available as a result of the development". However, this same requirement is not included for growth at smaller settlements including Minor Rural Centres, Group Villages, and Infill Villages. • Anglian Water requests that this qualifying statement to demonstrate that adequate infrastructure is available, should be applied to all the settlement categories within the settlement hierarchy, so development proposals clearly address infrastructure capacity - this includes wastewater treatment capacity in the network and the receiving WRC (as evidenced by the Stage 2 Detailed Water Cycle Study). For small settlements (e.g. Tadlow) where we have WRCs with a descriptive permit i.e. Descriptive Works - our position statement indicates that proposals that seek to connect to our network will be objected to unless the developer can demonstrate there is sufficient capacity at the works, OR an onsite solution such as a package treatment plant is approved. 	<p>209162 (Anglian Water Services Ltd)</p>
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<p>Alternatively, similar wording to Policy S/DE clause 1.c could be used for the smaller settlement categories to ensure "There is the necessary infrastructure capacity to support the development".</p>	
<p>Environment Agency requests changes to policy wording at the end of points 1 and 3:</p> <p>'Residential development and redevelopment.... provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development <i>and areas of flood risk are avoided.</i>'</p>	<p>211131 (Environment Agency)</p>
<p>Comments objecting to the policy include:</p> <ul style="list-style-type: none"> • suggests policy classification lacks currency and, when combined with other draft plan policies, risks excluding sustainable small sites under one hectare, contrary to NPPF paragraphs 73 and 83 • argues policy sections (9) and (10) impose limitations on growth, policy is unjustified and ineffective, failing to deliver necessary growth and contradicting paragraph 36 of the NPPF. • inconsistent with key principles of the NPPF. Paragraph 72 acknowledges the importance of strategic housing land supply comprising a sufficient mix of sites. • NPPF (2026) directs development to sustainable locations, the current hierarchy fails to support. 	<p>201856 (Chivers Farms Ltd), 204454 (Cottenham PC), 204557 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 204618 (Papworth Everard PC), 202331 (Granta Land Ltd - Land at Valley Farm, Meldreth), 201948 (KG Moss Trust & Moss Family), 202366 (The CLC Trust), 201969 (Shelford Investments), 202538 (Granta Land Ltd - Land West of Station Road, Meldreth), 202651 (Granta Land Ltd - Land at Sheene Farm, Meldreth), 202667 (Granta Land Ltd - Land East of Station Road, Meldreth), 204056 (E W Pepper), 208680 (Guilden Morden Developments Ltd), 208773 (Croudace Homes),</p>

<ul style="list-style-type: none"> • recommends change to policy reflecting the role of railway stations to reflect Government policy. Upgrade settlements with direct connections to high-quality public transport. • reassess hierarchy, include a new category for 'Well Connected Minor Rural Centres' including Fulbourn, Milton, Melbourn, and Waterbeach prioritising growth over less sustainable options • states potential to undermine the growth of rural communities • recommendations to assess settlements individually on sustainability, connectivity, and functional integration and then review hierarchy • indicative maximum scheme sizes are arbitrary and should be removed. Should be assessed on site context rather than fixed thresholds. • suggests removal of development without limitation on sites within the three Rural centres • requests limits on individual schemes in line with those specified in adopted Neighbourhood plan • states policy neglects sustainable opportunities at the Edge of Cambridge • states policy applies only to land within defined development extents creating ambiguity regarding the assessment of sites with strong ties to Cambridge 	<p>208785 (Granta Land Ltd – Land East of Station Road, Meldreth) 208809 (Granta Land Ltd – Land West of Station Road, Meldreth), 201955 (M Asplin), 201958 (M Asplin), 201963 (M Asplin), 202103 (Cambridgeshire County Council), 202559 (Ely Diocesan Board of Finance), 203049 (Cemex UK Properties), 203163 (Christ’s College), 203315 (J Manning), 203393 (Jesus College), 204103 (G W Balaam & Son), 204125 (Emmanuel College), 204143 (G W Balaam & Son), 204173 (J Johnson), 204445 (Bellway Strategic Land), 204459 (Wain Estates), 204514 (Redrow Homes South Midlands), 204949 (Places for People), 205132 (Axis Land Partnerships Ltd), 203408 (Jesus College), 204244 (Bellway Strategic Land), 204398 (Hill Residential (Great Abington Site), 204566 (Rosconn Group), 204858 (Pigeon), 203982 (Abbey Properties Cambridgeshire Ltd), 201006 (M Colville), 202366 (The CLC Trust), 205024, 209746, 209747, 211523, 211522,</p>
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<ul style="list-style-type: none"> • revise the settlement hierarchy methodology to ensure consistent and transparent comparison between Group Villages. • considers the hierarchy inconsistent with the distribution of growth set out within the Development Strategy • Group villages not in the green belt should be elevated in the hierarchy • Permitting windfall development inside development extents disregards the sustainability of Rural Centres and prevents their growth. • discrepancy between draft Policy S/SH and the housing requirements outlined in Figure D1 of Appendix D • Local residents should have input • development adjacent to settlement boundaries should be allocated for • quantum of development which a settlement can support should consider the wider proximity to services not just services in Central Cambridge and Market Towns • Instead of the arbitrary 8km cycle distance, points should be awarded to settlements which benefit from the Greenways; their purpose is to allow non-motorised commuting to services and employment including in Central Cambridge • fails to recognise that there are services and job opportunities outside of Central Cambridge and the Market Towns 	<p>211521, 211520 (Endurance Estates), 211198, 211208 (R Raywood, A Bradney and D Unwin), 211586 (Terra Strategic), 211458 (Hayfield Homes Construction Ltd), 211048, 211060 (Wates Developments Ltd), 207022 (Mac Mic Land)</p>
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<ul style="list-style-type: none"> • suggests Waterbeach new town and Waterbeach to be considered as one complete settlement and (both) be at Town tier. • Papworth Everard should be a Group village as is no longer on a par with other Minor rural centres. • Horningsea should be reclassified as a Group village to reflect scale, characteristics and sustainability. • queries identification of Linton as a Minor rural centre • lacks evidence to support Over as a Group Village and not elevate to a Minor Rural Centre 	
<p>Objects to the settlement hierarchy on the basis that it restricts growth in villages such as Great Wilbraham, undermining their ability to remain viable and meet local needs. States this approach risks turning smaller villages into dormitory settlements, increases dependence on private cars and reduces freedom for non-drivers including children and older residents.</p>	203338 (Great Wilbraham PC)
<p>Suggests policy could set out how new and emerging settlements will be addressed during a future review</p>	203414 (Lichfields)
<p>Comments regarding lack of review of the capacity of settlements to accommodate additional development or development threshold limits remain relevant if no sites are available</p>	203895 (Hill Residential (Fulbourn Site)), 203935 (Hill Residential (Sawston Site)), 202083 (J Francis), 211622 (Bloor Homes Eastern), 211613 (Bloor Homes Eastern), 204161 (Hill Residential (Hardwick Site))

<p>States in naming the largest villages ‘Rural centres’ it’s unhelpful, they are not rural and this locks people out of planning discussions as is counterintuitive. Whereas Minor rural centres are rural in character.</p>	<p>203888 (Histon and Impington PC)</p>
<p>Concern infill villages not located on major transport corridors will remain without reliable and frequent public transport opportunities, affecting numerous villages.</p>	<p>203888 (Histon and Impington PC)</p>
<p>Suggests consideration of sustainability measures and infrastructure investments associated with the wider growth location should be more fully acknowledged in the settlement hierarchy assessment. (Linton site)</p>	<p>204837 (Vistry Group)</p>
<p>Redrow requests an assessment of the sustainability credentials of each settlement in the District, undertake a review of the capacity of the most sustainable villages in South Cambridgeshire—including Group Villages located close to Cambridge with strong transport links (Hauxton) - to determine whether additional development can be accommodated within existing development framework boundaries, allocate additional land at the edges of these settlements to ensure that growth is appropriately directed, sustainably delivered, and consistent with the Plan’s stated objectives.</p>	<p>204514 (Redrow South Midlands)</p>
<p>The respondent supports the proposed Policy wording</p> <ul style="list-style-type: none"> • Bar Hill is designated as a 'rural minor settlement' with a role in providing services for a small rural area, having more facilities than most other settlements in Greater Cambridge. • Bar Hill's as a MRC, strategic location on the A14 is beneficial for the logistics sector, suitable location for industrial and logistics growth in 	<p>204167 (Tritax Big Box Developments)</p>

<p>Greater Cambridge, being outside the Green Belt and close to the city, unlike Histon and Impington and access to a local workforce and necessary infrastructure for industrial and logistics uses.</p> <ul style="list-style-type: none"> • The respondent references key paragraphs from the NPPF 2024 and NPPF 2026 that align with the operational needs of the freight and logistics sector. 	
<p>Comments on the policy approach include</p> <ul style="list-style-type: none"> • Suggests current approach does not align with the NPPF's direction to boost new housing supply, as noted in paragraph 61 and amending part 5 of Policy to allow residential development within defined extents and on adjacent land, provided adequate services and infrastructure are available • restrictive approach in smaller villages risks limiting opportunities to sustain rural communities. • policy focuses on limiting growth rather than enabling rural sustainability • scheme sizes make affordable housing delivery harder, support of local services or responding flexibly to local need. • Little reference to rural transport gaps, digital connectivity or the cumulative impact of small developments. 	<p>203149 (Cambridgeshire ACRE), 203149 (Cambridgeshire ACRE), 204708 (Croudace Homes), 204976 (Martin Grant Land), 211614 (Bloor Homes Eastern)</p>

<ul style="list-style-type: none"> Stronger rural proofing would allow more flexibility where schemes support affordable homes, local services and community led development. 	
<p>“Rural Centres” is a misleading term. These are among the least rural villages: they do not feel remote, lack strong rural characteristics, are close to Cambridge, benefit from good transport links, and are not shaped by a rural economy. The label is therefore unhelpful and should not be applied to the largest hub villages.</p> <p>“Minor rural centres” are more genuinely rural, although many function economically as suburban settlements, with high levels of commuting and, in some cases, their own science parks. Describing these places as rural introduces bias into policy discussions and planning decisions, obscuring their hybrid or suburban character.</p> <p>“Smaller villages”, by contrast, are distinctly rural, facing traditional rural challenges and displaying classic rural characteristics, yet they are not classified as rural under the current terminology.</p>	211000 (Cambridgeshire County Council)
<p>Settlement Hierarchy Study Update represents a proportionate review of the earlier assessment rather than a comprehensive reassessment of settlement roles and relationships between settlements. As such, it provides limited analysis of how committed and proposed growth, improved connectivity and changing functional relationships may influence the suitability of settlements.</p>	210227 (Vistry Group)

<p>It is considered that the approach taken through the update remains overly focused on existing services and facilities and does not sufficiently account for committed growth, proposed allocations, or the dynamic role that some settlements play within the wider spatial strategy. In particular, the assessment gives limited weight to the strong functional relationship between certain Group Villages and Cambridge itself. (Land at Fen Ditton)</p>	
<p>Concerns that new evidence and site-specific information only became available at Regulation 18, affecting the ability to comment earlier on settlement hierarchy implications.</p>	204808 (G Shaw)
<p>Comments on classification of Melbourn and Meldreth include:</p> <ul style="list-style-type: none"> • suggests Melbourn and Meldreth to be considered as one settlement. • railway station serves both villages • villages of Melbourn and Meldreth should be designated as a Rural Centre • reiterates Melbourn and Meldreth function as a combined settlement with shared services, facilities and schools. Notes recent active travel upgrades strengthen links. • argues a combined or re-scored settlement should be designated as a Rural centre 	206217 (Granta Land Ltd - Land at Valley Farm, Meldreth), 202331 (Lanpro)

<p>Comments on classification of Melbourn:</p> <ul style="list-style-type: none"> • Melbourn could be re-designated as a Rural Centre • Settlement Hierarchy Paper (2021) allocates 14 points, with high scores for shops and services and secondary school • Melbourn is the largest village in the south-west of the district • Greenway Scheme will provide better accessibility to Cambridge by sustainable modes • higher score than Rural Centres in terms of secondary school provision than Great Shelford and Stapleford, designated as a Rural Centre 	<p>211417 (CALA Group Ltd), 211061 (Wates Developments)</p>
<p>Comments for classification Great Shelford and Stapleford include:</p> <ul style="list-style-type: none"> • Argues the classification as a single Rural centre undermines the distinct identities of the two villages and contravenes clause 1a of Policy S&GS 12 Neighbourhood Plan • Concerns raised regarding implications of permitting unrestricted residential development in a combined rural centre • They have a very different range of amenities and services; highlights a lack of amenities in Stapleford • Suggests that minor rural centre is a more appropriate classification for Great Shelford 	<p>201549 (Stapleford PC), 202674 (S Berridge), 2010894 (Great Shelford PC)</p>
<p>Comments regarding re-classification of Cottenham:</p> <ul style="list-style-type: none"> • size suggests Rural Centre not Minor Rural Centre 	<p>207654 (Cottenham PC), 204454 (Cottenham PC), 211219 (Terra Strategic), 211232, 211580</p>

<ul style="list-style-type: none"> • need for delivery of services and infrastructure due to Significant increase in housing. • concern of impact for long-term sustainability of the village • proposed change in settlement status is contrary to the level of services and facilities within Cottenham. • At appendix 11 Cottenham scored 15 points, higher than Gamlingay (scored 7) and Willingham (scored 9). Both of these settlements are also identified as minor rural centres. Settlements with varied scores and are identified as the same category village should not be the case. 	(Living Space Housing), 211246 (Manor Oak Homes)
Comments regarding housing limits in Cottenham: Responder objects to indicative maximum scheme size of 30 dwellings, noting identified housing requirements for neighbourhood areas of 130 dwellings identified to be delivered at Cottenham between 2024-2045. How will this number of dwellings be delivered. The defined development extent for Cottenham as being drawn tightly around existing development at the settlement, with no development opportunities within the defined developed extent that would be sufficient to deliver the 130 dwelling neighbourhood area requirement identified by the Draft Plan.	211277 (Woolsington One Ltd)
Comments on classification of Willingham as a Minor Rural Centre. <ul style="list-style-type: none"> • There is no justification for the arbitrary figure of a maximum of 30 dwellings in MRC. 	211263 (Terra Strategic)

<ul style="list-style-type: none"> This limits the level of growth that the Minor Rural Centre and less efficient use of land contrary to national planning policy which requires proposals to make the most efficient use of land. 	
It is strongly considered that the failure of the evidence base to consider all modes of transport and bus services within Fowlmere and its connectivity to the surrounding settlements represents a flaw in the overall settlement assessment. This has subsequently resulted in sites that are being promoted within Fowlmere not being properly considered for development and not being subject to an independent site assessment.	211048 (Wates Development Ltd)
Suggests review Fulbourn, a Minor rural centre, and include as a Rural centre due to its facilities and transport links.	204962 (Miller Homes)
Notes the inconsistency of retaining Group village development restrictions for Elsworth while a major development of over 13,000 homes is proposed within close by.	202123 (Elsworth PC), 202346 (P Deer), 201906 (C Deer)
Suggests designation of Bourn Airfield as a Rural Centre	203414 (Juniper Propco (Bourn) Limited)
Suggests Bassingbourn and Kneesworth should not be 2 settlement types as they are one settlement.	201373 (Gentian Development Ltd)
It is important that the hierarchy is applied flexibly and in a manner that supports the effective delivery of the development strategy. Opportunities such as Fen Ditton, which are capable of accommodating additional growth in a sustainable manner, can play an important role in contributing to housing delivery, particularly where they are of a scale that complements existing	210228 (Vistry Group)

services and facilities while supporting their long-term viability. (Land at Fen Ditton)	
Argues that Caxton should be identified as a Group Village due to its close proximity to Cambourne and the high level of services and facilities accessible by walking and cycling. States that these sustainability credentials justify an upgrade in classification.	204274 (LVA)
Land to the west of Cambridge Road, Melbourn We do not disagree with Melbourn's position in the Settlement Hierarchy and endorse its recognition as a sustainable location and able to accommodate additional residential growth. The approach proposed within Policy S/SH of the Plan, however, is that Minor Rural Centres will support an indicative maximum scheme size of 30 dwellings. It is evident that Melbourn is capable of accommodating larger sites, with the proposed allocation for 120 dwellings at land to the west of Cambridge Road (Policy reference S/RRA/CR), underlining this point.	211061 (Wates Developments)
Land at Swans Corner (HELAA Reference 208803) Whittlesford has a good range of services and facilities for a Group Village. It contains a primary school, village store, a post office and other community facilities. It also has bus connections to Cambridge and Saffron Walden and a train station providing good connections to Cambridge and London. In our opinion, Whittlesford is a suitable village for some growth and additional	211692 (native land)

<p>residential development should be supported in the emerging Greater Cambridge Local Plan.</p>	
<p>Land at Mingle Lane, Great Shelford</p> <p>While we agree with the placement of Great Shelford and Stapleford within the settlement hierarchy, it must be remembered that this area has excellent access to Cambridge which will improve as part of future infrastructure initiatives such as the CSET busway and the new Cambridge South Station as part of the Cambridge Biomedical Campus which will be directly accessed from Shelford station.</p> <p>Given the recognition of the number of services and facilities available within the settlement, it is imperative that growth is directed to this location. The Land at Mingle Lane allocation should therefore be re-introduced.</p>	<p>208905 (Nightingale Land and Hill Residential Ltd)</p>
<p>North of Willingham Road, Over (HELAA reference 40323)</p> <p>Plan lacks sufficient residential sites in the north western quadrant of Cambridge, failing to acknowledge the need for housing for residents who work to the west.</p> <p>The site North of Willingham Road, Over meets the criteria for smaller site allocation, and the Plan lacks justification for not including such sites, indicating a potential failure to meet local housing needs.</p>	<p>203467 (ESCO Prospect)</p>

<p>A detailed assessment of smaller sites, including North of Willingham Road, Over, should be conducted to ensure at least 20% of allocations in the Local Plan are on sites of the appropriate size. Due to the significant size constraints placed on settlements it is not possible to deliver these as windfall sites.</p>	
<p>Land at Prospects Royston, previously Three Prospects Farm, land east of Royston, (HELAA ID 40511).</p> <p>Policy S/SH should be revised to identify land beyond the A505 at Royston as being in the second tier of the hierarchy, below the Cambridge urban area itself but above Cambourne and the other new settlements and on a par with sites on the edge of Cambridge as a location for strategic and sustainable housing and employment growth.</p>	203331 (Wilson Bowden Developments Ltd)
<p>Land at Girton Road, Girton (site ID 115170)</p> <ul style="list-style-type: none"> • Responder states the higher growth scenario from the Greater Cambridge Employment and Housing Needs Update should be used in future policy revisions. • Allocation of small and medium sized sites is essential to meet housing requirements, as over-reliance on windfall sites is not a sound planning approach. 	204361 (Wain Estates)

<ul style="list-style-type: none"> • site ID 115170, is one such site which is well-situated and well-connected to support sustainable transport, aligning with the Local Plan's ambitions for knowledge-intensive sectors. 	
<p>Land North of Pampisford Road is situated on the edge of Great Abington (Site Id: 115179)</p> <ul style="list-style-type: none"> • Respondent requests removal of arbitrary limitations for the scale of development that might take place in Group Villages. • Or limits increased, as 8 is not justified and limitations applied to other settlements in the hierarchy removed also with all sites evaluated on their own merit against sustainability and the capacity of existing facilities and services to accommodate growth. • Limits on development are inconsistent with Government policy on promoting a step change in growth. • Where there is no neighbourhood area, the plan examines growth in those villages and directly allocates sites for development. Great Abington is a Group Village but not a Neighbourhood Area, and yet it sits adjacent to Granta Park, a major employment area, a sustainable location, can support economic growth at this employment site. The site is an ideal candidate for allocation through a change in policy. 	204566 (Rosconn Group)
Land south of Hauxton Road in Little Shelford	211254 (R Harvey)

<ul style="list-style-type: none"> • The responder has promoted a site in Little Shelford. Little Shelford is defined as an Infill Village in the settlement hierarchy and has a reasonable level of services and facilities. Given the sustainability credentials of Little Shelford, it is felt that it would be more appropriate for it to be defined as a Group Village. • Concern there is no review of the capacity of settlements to determine available land within the development framework boundary, or the development threshold limits remain relevant. • Concern no major residential development opportunities within the development framework boundary of Little Shelford. Small scale would not deliver affordable housing or provide any meaningful support to existing services and facilities. Little Shelford affordable housing needs are not being met. • Amendments should be made to the development strategy to direct development to the more sustainable infill villages including Little Shelford to support existing services and facilities, deliver additional facilities, and meets identified affordable needs of villages. 	
<p>Land at west of North End, Bassingbourn (HELAA ID: 200809).</p> <ul style="list-style-type: none"> • Important that small and medium size sites such as the site proposed, to meet the housing requirement of the area, compared to major sites and new settlements. 	

<p>A one size fits all approach to site allocation is inappropriate and does not allow individual characteristics and benefits of a site. The Framework is clear that sufficient allocations should be included in Local Plans, and the Plan fails to facilitate sufficient allocations in a range of sustainable settlement.</p>	<p>211201, 211200, 211210 (Rainier Developments & Strategic Land)</p>
<p>Concern the level of windfall allowance within the overall housing delivery figure for the Plan. Represents a significant proportion of the total housing to be delivered and is not guaranteed. Given the housing need figure for Greater Cambridge and reliance on large sites and new settlements to deliver the majority of the residual housing need, the Plan should allocate additional smaller sites to ensure the housing need is met and particularly within the short term.</p>	<p>211272 (Mr & Mrs Smith)</p>
<p>Support Cambridge Junction and Create Cambridge in asking that:</p> <ul style="list-style-type: none"> • cultural infrastructure’s ongoing revenue and organisational capacity needs are recognised, not just physical buildings • culture is embedded in cross-cutting outcomes (innovation, health, education, community resilience) • partnership frameworks between councils, cultural organisations and communities are referenced as delivery mechanisms aligning community infrastructure with lived cultural use. 	<p>204830 (G Shaw)</p>

<p>Concern 'Rest of the Rural Area' comprises rural centres and group villages, a total of 48 settlements, have only 3 sites allocated for a total of 205 new homes.</p> <ul style="list-style-type: none">• The proportion of development attributed to major strategic sites is a risk to deliverability and inconsistent with the Framework.• Regarding draft allocations, a 'blanket approach' has been taken, with maximum dwelling numbers given to all settlements below Rural centres.	211209 (Rainier Developments & Strategic Land)
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Policy S/DE: Defined development Extent

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

A number of comments supported the approach to Defined Development Extents (DDE), citing reasons including their role in protecting the countryside, village character, and focusing development into sustainable locations.

Some comments proposed specific amendments where they considered the proposals map did not correctly reflect the existing position. Others proposed that the DDE should be amended to include their proposed development site.

Objections to the DDE policy considered the policy was too restrictive and should be more flexible. They were restricting growth in sustainable villages where development was needed. The DDE has not been changed significantly since 2004. Some considered the approach did not reflect draft National Planning Policy.

Response to main issues:

Comments supporting the role of developments and approaches to specific areas are noted.

Defined development extents identify which areas should be considered part of settlements for planning purposes so that it is clear where policies for the built-up areas of settlements give way to policies for the countryside. This is necessary to ensure that the countryside is protected from gradual encroachment on the edges of villages and to help guard against incremental growth in unsustainable locations. In the countryside development is generally restricted to uses that need to be located there. Making the policy more flexible or including areas of open land on the edges of settlements would undermine the development strategy, which seeks to focus development on sustainable locations responding to evidence including in relation to climate change and transport.

Some respondents argue that the current policy is restricting growth outside defined development extents in villages. The strategy and policy approach is to enable development in the most sustainable locations, working in conjunction with policy S/SH: settlement hierarchy. Therefore, defined development extents do play a role in directing growth to the most sustainable locations across Greater Cambridge. The plan has demonstrated how identified development needs are to be met.

There are a range of circumstances where development outside defined development extents will be supported, including affordable housing exception sites. Villages also have the opportunity to produce neighbourhoods plans if they wish to address specific local issues.

Some comments reference compatibility with national policy, and in particular the Draft NPPF 2025. Whilst as a legacy local plan the soundness of this local plan will be considered against the NPPF 2024, it is notable that the draft NPPF sets specific policy for development within and development outside settlements. The Defined Development Extents would therefore assist with the application of these policies. Some comments also referenced the draft NPPF proposal for flexibility at railway stations. The outcome of that consultation is not known. The location of railway stations has been a consideration when determining the development strategy.

Since the Draft Plan stage, a further review of the defined development extents was undertaken to ensure it remains up to date with the current extent of the built up area of the settlement where planning permissions have been largely completed.

A number of comments reference specific site proposals they have put forward for allocation. Whether the site should be identified for development has been reviewed through consideration of the development strategy, informed by evidence including the Housing and Economic Land Availability assessment. It is not the role of a change to the Defined Development Extent to enable development of a site, that would be done through allocations. Changes have therefore not been made to bring in land which does not meet the definition.

In terms of specific policy wording changes, it is not necessary to widen paragraph 2c, as infrastructure examples sites in comments would be able to demonstrate their need for a countryside location.

Responses to representations which propose a change to the framework rather than to reflect an allocation:

- **Land west of Old North Road, Bassingbourn cum Kneesworth** – Updates to reflect consented and completed developments have been identified on the Proposed submission proposals map.
- **Caxton Gibbet food retail site, Cambourne** - This land falls outside the built up area of the village. It is a distinct site more closely related to serving the highway network, the proposed DDE in this location is sound.
- **Land off Ermine Street Caxton** - The defined development have been reviewed. Sites with planning consent have been added when they are complete or substantially complete. The site reference has yet to be built.

- **Between Brook Street and Brockley Road, Elsworth** - This area extends beyond the built up area of the village and is correctly shown as being outside the defined development extent.
- **Land North of Thriplow Road, Fowlmere** – The defined development have been reviewed. Sites with planning consent have been added when they are complete or substantially complete. The site reference has yet to be built.
- **South of Thompsons Meadow, Guilden Morden** - The planning committee report on 20/03151/REM– Land South of Thompsons Meadow, states 'There is also an undeveloped grassed area to be retained in the south east corner of the site which helps to mitigate the impact of the development on views into the site from the access along Thompsons Meadow and contributes to retaining a countryside and edge of village character.' The countryside edge should be defined to the extent of the built up area, and the proposed DDE in this location is sound.
- **Howells Way, Hardwick** – DDE has been reviewed in this location to take account of the now completed development.
- **Land at Cottenham Road, Histon** - DDE define where policies for the built-up areas of settlements give way to policies for the countryside. This is necessary to ensure that the countryside is protected from gradual encroachment on the edges of villages and to help guard against incremental growth in unsustainable locations. In this location the low density of development means the area is distinct from the built-up area. The area has been recognised as green belt in successive local plans. There are no exceptional circumstances to remove the land from the green belt.
- **The Boundary, High Street, Horningsea** - Disagree. The land identified does not form part of the built up area of the village. The line identifies an appropriate distinction between the built up area and the countryside. The land has been identified as green belt, there are no exceptional circumstances for its release.
- **Horseheath Road and Bartlow Road Linton** - Whilst a number sites were granted planning permission where the tilted balance was applied because of a lack of 5 year housing supply at the time of their consent, when these developments are

complete (or substantially complete), the developments have been taken into account in preparation of the Proposed Submission policies map, reflecting that they now form part of the built up area of the village.

- **TPP Campus Melbourn** – The site is recognised as an Established Employment Area, outside the defined development extent. This is considered the appropriate response to the site.
- **Site Allocation S/RRA/CR, Land to the west of Cambridge Road, Melbourn** – The site is shown as an allocation on the proposed submission policies map. Once the built form is considered through the planning application process the DDE can be amended in a future review of the local plan.
- **Former Oakington Tomato Farm, Dry Drayton Road, Oakington** – this site is on the western edge of Oakington. Whilst it did have glass houses present, is open nature and separation from the village means that it would not fall within the definition of the defined development extent.
- **Land at Gog Magag Way and Haverhill Road Stapleford** - The Chalk Hill development referenced was a permitted as rural exception site, and remained in the green belt. There are no exceptional circumstances to release the Strawberry Feilds site from the green belt.
- **Hay Street, Steeple Morden** – The supporting text of the policy states that ‘Property boundaries shown on Ordnance Survey (OS) mapping have been taken into account in defining defined development extents. However, since there are many large gardens on the edge of settlements, the defined development extents sometimes cut across such gardens, especially (but not solely) if parts of those gardens relate more to the surrounding countryside than they do to the built-up areas. The 'cutting' of some gardens is regarded as a positive development management tool to limit the potential for further residential development in smaller villages with few facilities and little or no public transport’. The line in Hay Street remains appropriate.

- **The Walled Garden, Whittlesford** - This site is in the green belt, and correctly defined as being outside the DDE. Other sites have been identified to meet housing needs, and exceptional circumstances to release this land from the green belt have not been identified.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for Policy includes:</p> <ul style="list-style-type: none"> • High bar for development outside of villages/rural centres • protection of open countryside • Protection from encroachment • prevents unsuitable development inside and outside of development extents. • Without policy small rural communities could quickly lose their character. • no new housing developments outside defined development areas, except for Parish-led Neighbourhood Plan allocations. • Intent to ensure development located in the most sustainable places • essential for controlling development around villages • principle of defining settlement boundaries around villages 	<p>201013 (M Colville), 201769 (C Blakeley), 201896 (R Pargeter), 202615 (Ickleton PC), 204974 (D Davies)</p>

<ul style="list-style-type: none"> potential rural exception sites would dry up as parcels of land at village edges would offer the prospect of making large profits if developed and proposals based on maximising developer profits would predominate. should be no exceptions for green belt land 	
Cambridge Science Park, Cambridge Support for inclusion of site within the Defined development extent.	203070 (Trinity College, Cambridge),
Protect rural views.	209678 (H Hale)
Welcome the reference to heritage in criterion 1b.	210086 (Historic England)
Hay Street, Steeple Morden Objection to boundary in Steeple Morden. Should follow a consistent settlement edge aligned with adjacent built form and include the application site.	202095 (R Wright)
Horseheath Road and Bartlow Road Linton Object, amend to NOT include the Horseheath Road and Bartlow Road developments as resulted from the lack of a Local Plan being in place in 2015-2018	201670 (Linton PC)
South of Thompsons Meadow, Guilden Morden Object as DDE should be extended to reflect development south eastern part of the settlement (planning permissions S/3077/16/OL and 20/03151/REM)	201811 (Peter David Homes Ltd)
Caxton Gibbet food retail site, Cambourne Objection to boundary extent at Cambourne, extend to include land up to the A428, encompassing the Caxton Gibbet food retail site and the EV car charging area.	204011 (Abbey Properties Cambridgeshire Ltd)

<p>Land west of Old North Road, Bassingbourn cum Kneesworth (Site reference 210373)</p> <p>Comment Defined Development extent needs amending to reflect recent planning approvals.</p>	201374 (Gentain Development Ltd)
<p>Land North of Thriplow Road, Fowlmere</p> <p>Requesting review boundary for consented development 24/01254/OUT as outside the boundary, and for existing built development at The Triangle, Fowlmere which is outside of the DDE.</p>	205574 (Mulberry Strategic Land)
<p>Land off Ermine Street Caxton</p> <p>Suggests Caxton development extent be updated to reflect outstanding housing commitments at Land off Ermine Street, planning application reference 23/01335/OUT.</p>	204304 (LVA)
<p>Land at Cottenham Road, Histon</p> <p>Comments question why current boundary excludes a number of houses.</p>	200988 (D Jessop), 201278 (G Mortimore), 202873 (S Catling), 201430 (S Chivers)
<p>TPP Campus Melbourn</p> <p>TTP Campus should be designated as being part of the Melbourn DDE.</p>	210721 (TTP)
<p>The Boundary, High Street, Horningsea (site reference 59410)</p> <p>2021 Green Belt Study confirms a "weak distinction" between Parcel H05 and the inset, yet the map bisects this single planning unit. As an enclosed backland garden plot, the site makes a limited contribution to Green Belt purposes. The DDE must therefore be corrected to follow the physical property line, supporting sustainable small-site delivery.</p>	201995 (M Asplin)

<p>Land at Gog Magag Way and Haverhill Road Stapleford</p> <p>Built up area of the village was extended to the east of Stapleford in the early 2000s by residential development at Chalk Hill and again in the 2020s by development of the Strawberry Fields residential care village.</p>	<p>201550 (Stapleford PC), 210895 (Great Shelford PC)</p>
<p>Between Brook Street and Brockley Road, Elsworth</p> <p>Questions Defined Development Extent in Elsworth not embracing parcel of my land where historically there was residential housing. This would entail a movement of the DDE nominally to the west.</p>	<p>201431 (R Woolf)</p>
<p>The Walled Garden, Whittlesford</p> <p>Should not be in the green belt as it is village central and surrounded by houses) has been taken out of this latest plan having been in earlier stages.</p>	<p>204628 (C. Forbes Cable), 205412 (L Gardner)</p>
<p>Site Allocation S/RRA/CR, Land to the west of Cambridge Road, Melbourn</p> <p>Object as Site Allocation S/RRA/CR is shown outside the settlement boundary, inconsistent with other areas such as Waterbeach New Town. It should be within the defined development extent.</p>	<p>204641 (Vistry)</p>
<p>Objections to policy include:</p> <ul style="list-style-type: none"> • reformed NPPF (2026) emphasis for development in sustainable, well connected locations, which the current policy contradicts by restricting growth to defined boundaries. • minimal allocations, tightly drawn development boundaries and prescriptive limits on scheme size will constrain organic growth 	<p>202927 (The Trustees of the C Y Nutt Deceased Will Trust), 204129 (Emmanuel College (Long Road)), 204520 (Redrow South Midlands), 211524 (Endurance Estates)</p>

<ul style="list-style-type: none"> • largely unchanged since the 2004 Local Plan, with minor adjustments • stagnation and potential loss of local services • regarding all countryside sites equally is unjustified • flexible, criteria-based approach is sought to support appropriate rural growth and a balanced distribution of housing across Greater Cambridge • boundary-based approach inflexible • fails to acknowledge sustainable sites that are functionally part of the urban area. • policy lacks a mechanism for positively assessing sites based on accessibility and their potential to support sustainable development • lack of review to consider whether boundaries remain appropriate or capable of accommodating future development needs of individual settlements. • Where constrained by the Green Belt current approach prevents any meaningful outward expansion, even in sustainable locations. • should be subject to a full review to accurately reflect the development potential and sustainability of individual settlements and where no capacity within existing boundaries, the Local Plan should allocate appropriate village edge sites in the most sustainable locations • fails to allow for well-connected windfall growth in villages on the basis set out above in relation to policy S/SH 	
<p>Anglian Water supports the policy requirement 1.c to ensure that there is the necessary infrastructure to support the development within defined settlement extents. However, it</p>	<p>209163 (Anglian Water Services Ltd)</p>

<p>is considered that this should be equally applicable to developments outside defined settlement extents but may still be adjacent to the settlement and/or our WRC catchments - e.g. Rural exception sites.</p> <p>The policy does not specifically reference the delivery of utility services /infrastructure in the countryside, which would include critical water and wastewater infrastructure to serve existing and future communities.</p>	
<p>Responder requests changes to policy wording at the end of points 1 and 3:</p> <p>‘Residential development and redevelopment.....provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development <i>and areas of flood risk are avoided.</i>’</p>	Anglian Water Services
<p>Objects to policy and appendix are unsound as they (para 2.138) limit boundary changes largely to completed development.</p> <ul style="list-style-type: none"> • This creates a circular methodology that constrains the identification of sustainable small sites, contrary to the NPPF requirement to proactively identify land to boost supply (paragraph 73) and support thriving villages (paragraph 83). • The blanket treatment of residential gardens is overly rigid, and the approach is premature in the absence of updated Green Belt and “grey belt” evidence, reducing flexibility and clarity at plan-making stage. 	202005 (M Asplin), 204272 (R2 Developments Ltd)
<p>Objection to Policy includes:</p> <ul style="list-style-type: none"> • focusing development solely within DDEs is inconsistent with draft Policy S5 of the NPPF, which advocates for a more flexible approach to development locations 	204272 (Pegasus Group), 204292 (R2 Developments Ltd), 211479 (G Robinson and Partners),

<ul style="list-style-type: none"> • hinder sustainable growth by restricting new homes in locations just outside these extents, despite their proximity to public transport. • approach does not align with the government's direction to boost housing supply as outlined in paragraph 61 of the NPPF • approach contradicts the NPPF's pragmatic direction towards allowing suitable development near existing settlements and transport infrastructure. • Locations near Foxton Railway Station cited 	
<p>Comments on the policy raise concerns that:</p> <ul style="list-style-type: none"> • Boundary largely unchanged since 2004 boundary • inconsistent with proposed NPPF changes that advocate for a more flexible approach, allowing development on well-related sites. • suggests part 1 of policy to allow development on unallocated land well-related to defined development extents, aligning with the NPPF's pragmatic approach. • boundaries limit the opportunities for any development in villages • housing and affordable housing needs of these villages would not be met. • no support for existing services and facilities, or the delivery of additional facilities 	<p>202570 (Ely Diocesan Board of Finance), 203318 (J Manning), 204171 (Hill Residential (Hardwick Site)), 204411 (Hill Residential (Great Abington Site)), 204711 (Beechwood Estates Ltd), 204728 (Croudace Homes), 204985 (Martin Grant Land), 211247 (Manor Oak Homes), 211255 (R Harvey), 211615 (Bloor Homes)</p>
<p>Comments existing boundaries have largely not changed significantly since 2004. The current extent restricts development, not supporting existing services or allow for the delivery of additional facilities (noted Whittlesford, Swavesey, Fulbourn).</p>	<p>202368 (The CLC Trust), 204567 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 203897 (Hill Residential (Fulbourn Site))</p>

Objection to policy due to its inflexibility, not positively prepared or justified. Update to allow for flexibility in development outside defined boundaries to address unmet local housing needs.	205031 (Endurance Estates)
Concern that development boundaries drawn tightly around the existing settlements and excluding existing properties and built form. Question how the windfall allowance can be met, without relaxation of the Defined Settlement Extents, to enable smaller sites that are more immediately deliverable in the short term to come forward.	211273 (Mr & Mrs Smith)
Suggest policy would benefit from supporting information on how to interpret local character.	202735 (Cambridge Past Present and Future)
Defining development extents provides clarity, but the sharp distinction between inside and outside boundaries may limit flexible responses to rural housing and service needs. While Rural Exception Sites are supported, there is little recognition that small scale growth on the edge of villages can help sustain schools, shops and community facilities. The policy does not reference rural infrastructure constraints such as transport, drainage or digital connectivity. Stronger rural proofing would allow limited, well designed edge of village development where it meets local need and supports long term village sustainability.	203151 (Cambridgeshire ACRE)
Revise the wording of Policy S/DE to enable a more flexible approach to development outside of defined development extents. Draft Policy S/DE should seek to accord with draft Policy S5 of the 2025 NPPF. This would ensure that the Local Plan, upon adoption	208338 Thakeham Homes Ltd)

<p>would not conflict with National Policy, but also widen the scope of where the principle of development would be applied allowed outside of settlements.</p>	
<p>Policy is not sufficiently flexible to allow for unallocated development that is located beyond the settlement boundary when there is a specific need for the development type.</p>	<p>208682 (Guilden Morden Developments Ltd)</p>
<p>The use of settlement boundaries should not preclude the ability of sustainable development opportunities from coming forward and should include a mechanism to ensure that development beyond settlement boundaries can come forward to respond to changes in circumstances over the plan period. Indeed, such an approach is currently being consulted by Government as part of the national decision-making policies and the policy should be modified to allow such flexibility with circumstances relevant to Greater Cambridge. Development should be directed to the more sustainable villages including Great Shelford and Stapleford to support existing services and facilities, deliver additional facilities, and meet identified affordable needs of villages.</p>	<p>208906 (Nightingale and Hill Residential Ltd)</p>
<p>The proposed policy based on settlement boundaries (or defined development extents) around settlements is supported. However, the proposed development strategy to restrict the number of dwellings in certain tiers of the settlement hierarchy and the low number of site allocations proposed for the rural areas will prevent sustainable development from being brought forward unless further sites are allocated for development and included within the settlement boundary. Will need to be drawn more flexibility if windfalls relied upon are to be delivered.</p>	<p>211049, 211062 (Wates Developments and Landowners)</p>

<p>Agree that policy S/DE should include the need for there to be the necessary infrastructure capacity to support the development. That should also apply to the other development areas outside defined development extents and where development is supported by other policies in this Local Plan.</p>	<p>211926 (C Newell)</p>
<p>West of Broad Lane, Cottenham site:</p> <p>policy approach to development outside the defined development extents should be relaxed adjacent to the defined development extents for housing where this is required to meet an identified neighbourhood area housing requirement as an amendment to policy text.</p> <p>Woolsington One Ltd's promoted site represents a suitable, available, and deliverable site adjacent to the defined development extent, can come forward in the early years of the Plan period contributing towards meeting the neighbourhood area housing requirement for Cottenham of 130 dwellings.</p>	<p>211278 (Woolsington One Ltd)</p>
<p>Land north of Gog Magog Way, Stapleford (site reference 45417)</p> <p>Support in principle but policy is not supported by sufficient allocations in sustainable locations such as Rural Centres. There are many sustainable locations adjacent to the development extents where an allocation/Green Belt release would not harm the purposes of the Green Belt.</p>	<p>204177 (Mr & Mrs J Johnson)</p>
<p>Madingley</p> <p>Objects stating extent is restrictive in Madingley, amend to include a limited number of previously developed small sites on the edge of the village. Better reflecting national</p>	<p>202444 (University of Cambridge)</p>

policy, support the vitality of the village, enabling sustainable development without undermining character.	
<p>Mingle Lane Great Shelford</p> <p>Objection requesting update to extent in Stapleford at its boundary with Great Shelford on Mingle Lane. Remove the one remaining parcel of undeveloped land in Stapleford at its boundary with Great Shelford on Mingle Lane from the development extent.</p>	203057 (M Foote)
<p>Land to the land South of Station Road, Harston (site reference 115742).</p> <p>Objection to restrictions on development outside defined extents, amend to include exceptions for limited infilling in the Green Belt.</p>	203413 (Jesus College)
<p>Land south of Church Street, east of High Street, Guilden Morden (site reference 40300)</p> <p>Land off Swan Lane Guilden Morden (site reference 40304)</p> <p>Land at Town Farm Guilden Morden (site reference 40315)</p> <p>Land to the west of Brook End Steeple Morden (site reference 40294)</p> <p>Land to the southwest of Ermine Way Arrington (site reference 40292)</p> <p>Land to the east of Old North Road Kneesworth (site Reference 40299)</p> <p>Objects as current extents are too restrictive in specific villages, limiting opportunities for growth. Need to identify land within and adjacent to village boundaries for sustainable growth to enhance community sustainability, enabling new facilities, amenities, and transport.</p>	204068 (E W Pepper Ltd)

<p>Land South of St Neots Road / West of Howells Way, Hardwick (site reference 40273)</p> <p>Objection due to lack of flexibility and justification, regarding the rigid settlement limits for Hardwick not accurately reflecting the built form (Paragraph 2.132 of S/DE), and policy is contrary to Para 83 of the NPPF – policy should identify ‘Land South of St Neots Road / West of Howells Way, Hardwick’ for residential development.</p> <p>Settlement boundary was changed with the inclusion of the new development at Meridian Fields, at the southern edge of Hardwick. It is not clear why this development has been included within the defined settlement boundary, whilst Capstone Fields (immediately adjacent to the Site) and other residential built form along St Neots Road has been excluded.</p>	<p>204885 (Pigeon)</p>
<p>Fen Ditton</p> <p>Currently defined development framework boundary for Fen Ditton means that limited development would take place in this village. There would be no support for existing services and facilities. It is very likely most development opportunities that did exist within Fen Ditton have been taken up by now, and any that do remain would be for one or two dwellings only. There are no opportunities within the settlement boundary for Fen Ditton to deliver major development of 10 or more dwellings where affordable housing would be required.</p>	<p>202088 (J Francis)</p>

<p>Fulbourn, Great Shelford</p> <p>DDE boundary means that limited development would take place in this village. The housing and affordable housing needs would not be met. There would be no support for existing services and facilities, or the delivery of additional facilities. The community aspirations (in the made Fulbourn Neighbourhood Plan) for open space, improvements to health facilities, and for additional green infrastructure would not be met.</p>	<p>201949 (KG Moss Will Trust & Moss Family), 201970 (Shelford Investments)</p>
<p>Land at Valley Farm Meldreth (site reference 130982)</p> <p>Land West of Station Road Meldreth (site reference 131266)</p> <p>Land at Sheene Farm Meldreth (site reference 131267)</p> <p>Land East of Station Road, Meldreth (site reference 131268)</p> <p>Objection states policy not consistent with the draft new NPPF policy S5 supporting development outside settlements where is within walking distance of a well-connected railway station. Meldreth station is well-connected in terms of draft NPPF policy S5 and recommends additional exception in para 2 for development close to well-connected railway stations that refers to the new NPPF following publication of the final version in summer 2026.</p>	<p>202332, 202539, 202654, 202688 (Granta Land Ltd)</p>
<p>Land North of Pampisford Road, Great Abington (Site reference 40539)</p> <p>Objection, policy does not support the 'organic' growth of smaller settlements.</p>	<p>202927 (The Trustees of the C Y Nutt Deceased Will Trust)</p>
<p>Girton, Oakington, and Over</p> <p>Objection to boundary extent at Girton, Oakington, and Over amend to include Call for Site ID 115392 and additional sites from the Call for Sites in 2026.</p>	<p>204011 (Abbey Properties Cambridgeshire Ltd)</p>

<p>Emmanuel College: Long Road, Cambridge</p> <p>Object as the current boundary-based approach of Policy S/DE is seen as inflexible, failing to acknowledge sustainable sites that are functionally part of the urban area. The policy lacks a mechanism for positively assessing sites based on accessibility and their potential to support sustainable development.</p>	<p>204129 (Emmanuel College (Long Road))</p>
<p>Histon and Impington (Glebe Way Histon (site reference 40192))</p> <p>Concern for promoted sites which are on the edge of a settlements.</p> <p>Histon and Impington defined development framework boundary for means that limited development would take place in these villages, housing and affordable housing needs would not be met. There would be no support for existing services and facilities, or the delivery of additional facilities.</p>	<p>202107 (Cambridgeshire County Council (Strategic Assets))</p>
<p>Cambridge Science Park North</p> <p>Concern as Policy S/DE does not align with NPPF S5. Draft Policy S5 (principle of development outside settlements) sets out the requirement for only certain forms of development to be approved outside of settlement boundaries. This includes development for housing and mixed-use which would be “within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services”. Footnote 26 expands the use of the term ‘railway stations’ to include underground, tram and light-rail. The Cambridge Guided Busway is authorised through the legal mechanism of a Transport and Works Act Order (TWAO) and so it is considered that the guided busway would fall under the footnote definition.</p>	<p>211484 (Trinity College (CSP Limited))</p>

<p>Meldreth</p> <p>Concern as Policy S/DE does not align with NPPF S5; Meldreth railway station is well-connected in terms of draft NPPF policy S5. Suggests update to the settlement and green belt boundaries to include their properties within the village. Explicit exceptions should be added to Policy S/DE for sites that are close to a well-connected railway station given proposed changes to national planning policy.</p>	<p>206218 (Granta Land Ltd - Land at Valley Farm, Meldreth), 202668 (Granta Land Ltd- Land East of Station Road, Meldreth)</p>
<p>Land South of Shelford Road, Fulbourn (site reference 51610)</p> <p>DDE should be amended and land allocated. Site is beneficial for completing the village edge, contributing to a clear and logically defined development extent.</p>	<p>204965 (Miller Homes)</p>
<p>Great Wilbraham</p> <p>Great Wilbraham development extent leaves almost no potential sites and prevents further housing even though of a scale, density and character appropriate to the village. Noting that developments outside these extents may be allowed where it would support other policies in the plan; we argue that an explicit reason might therefore be to help make local communities sustainable. A small village such as Great Wilbraham does not have the finances or manpower to undertake a Neighbourhood Plan. The Council should be obliged to work with us to assess need and develop a plan.</p>	<p>203346 (Great Wilbraham PC)</p>
<p>North of Royston - Three Prospects Farm - Land to east of A505 and south of A10, Melbourn (Site Reference 40511)</p> <p>DDE should be revised to include an 'edge of Royston' allocation, or at least a reserve/safeguarded site for mixed-use development.</p>	<p>203325, 203328 (Wilson Bowden Developments Limited)</p>

<p>Hauxton</p> <p>Do not seek a direct amendment to the wording of Policy S/DE itself, but that defined development extents should be subject to a full review to ensure they accurately reflect the development potential and sustainability of individual settlements</p>	204520 (Redrow South Midlands)
<p>Land North of Pampisford Road, Great Abington (site reference 40256)</p> <p>Reliance on Neighbourhood Plans limits growth opportunities. Plan should allocate more small and medium-sized sites. Development extents are tightly drawn, limiting growth potential within settlements and undermining the viability of existing services. Failure to deliver necessary growth renders plan unsound.</p>	204545 (Rosconn Group)
<p>Land north of A14 Bar Hill (site reference 40121 and 40244)</p> <p>Objects to the wording of Policy S/DE, suggesting modifications are necessary to enable sustainable employment development on suitable land, including areas outside defined development extents. Wording is inconsistent with National Planning Policy. Assumption that land outside defined extents is unsuitable for development lacks justification. Modifications to the policy should be made to support the logistics and freight sector.</p>	204174 (Tritax Big Box)
<p>Support Cambridge Junction and Create Cambridge in asking that genuinely affordable cultural production space is required, and safeguards usable creative space from being diluted.</p>	204835, 204815 (G Shaw)
<p>Former Oakington Tomato Farm, Dry Drayton Road, Oakington (no site reference)</p> <p>Oakington Defined Development Extent should be amended to include the tomato farm which would allow this land (which is previously developed and accommodates two</p>	211740 Homes England

<p>dwelling houses) to come forward for development should it not be required for use to support the development of Northstowe.</p>	
<p>Land at Bartlow Road development, and The Land at Horseheath Road (no site reference)</p> <p>The windfall sites north east and south east of the village of Linton are problematic developments approved due to lack of a 5-year housing supply. They are shown incomplete on the village inset map and have incomplete boundaries. They therefore do not comply with the Plan criteria under Policy S/7 Page 11 Paragraph 30 and should not have been included in the defined development extent.</p>	<p>211929 (C Newell)</p>

Policy S/GB: The Cambridge Green Belt

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

Whilst some representations supported use of the local Green Belt purposes, others challenged that they were inconsistent with updated national Green Belt policy and that grey belt should have been identified and reviewed before determining the development strategy, and that the policy should make explicit reference to the grey belt.

Comments argued that exceptional circumstances existed for further Green Belt release. Some questioned the impact of Green Belt on the development strategy and that it channels development away from Cambridge and should be removed. Many representations said that a comprehensive review of the Green Belt should be carried out to identify grey belt and further sites for development should be identified in sustainable locations in these areas of lower contribution Green Belt land. There were comments that the updated Green Belt evidence should have informed the Draft Plan and been published then. There were several comments that purpose 1c of Policy S/GB is inconsistent with the second purpose in NPPF paragraph 143 in that it refers to communities and not towns and should be amended which could affect the implementation of grey belt policy at the planning application stage.

There was support for more ambition for the beneficial use of Green Belt land such as for amenity space and biodiversity. Some comments proposed adding new areas of Green Belt land (including at Cambourne and Great Shelford).

Representations questioned whether national policy had been followed when identifying the Green Belt release that the draft plan does propose. Comments supported land being maintained as Green Belt in a number of locations, including the West Fields and around Fen Ditton and Horningsea. Mingle Lane Great Shelford received support for maintaining the site as Green Belt (following its removal from the plan between the preferred options and Draft Plan stage), whilst another comment proposed that the allocation be reintroduced.

Little Wilbraham, Great Wilbraham, and Six Mile Bottom Parish Councils considered that the Green Belt was too tightly drawn to give flexibility for some development in villages. Clearer reference was requested to show how essential rural development, including farm diversification and local needs housing could come forward.

There were a large number of representations from developers and landowners identifying sites as grey belt and that they were suitable for development, many of which were accompanied by supporting information.

Response to main issues raised in representations:

A Cambridge Green Belt Assessment was published to accompany the First Proposals in 2021. An update to this study, the 'Greater Cambridge Green Belt Assessment Review following changes to National Policy and Guidance' (2026), has now been produced and is published to accompany the Proposed Submission Local Plan. The updated study has carefully considered changes to national planning policy and guidance, and considered issues raised in representations to the Draft Local Plan.

The study confirms that the long established Cambridge Green Belt purposes provide a locally-specific application of the NPPF purposes, delivering a more helpful structure for the analysis of variations in the role of Green Belt land than provided by the more generic NPPF purposes. The city has a Green Belt because of its historic character and all three Cambridge purposes form elements of NPPF Purpose D. The Study also considers how grey belt should be applied in a Cambridge context. It reviews parcel by parcel contribution to Green Belt purposes, highlighting areas that could provisionally be considered as grey belt where they do not make a strong contribution to Green Belt purposes.

Paragraph 146 of the NPPF establishes that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. The plan making process has not identified exceptional circumstances for Green Belt release to meet general needs. As such, the identification of the location of grey belt land within Greater Cambridge does not affect the Councils' position regarding the identified preferred development strategy. This is considered in depth in the Strategy Topic Paper and its Appendix 4. The Strategy Topic Paper also shows how the plan making process (including Sustainability Appraisal) has considered the merits of alternative strategies that would involve Green Belt release.

The updated Green Belt assessment provides further clarification about the relationship between the Cambridge Green Belt purposes and the national Green Belt purposes set out in the NPPF. Cambridge only has a Green Belt because of its historic character, and as such the Cambridge purposes are a locally specific application of NPPF purpose D: to preserve the setting and special character of historic towns. The Cambridge purpose which refers to 'communities' (part 1c of the policy) is therefore referring to preventing the necklace of villages surrounding Cambridge from merging into one another and with Cambridge, which is one of the factors defining the special character of Cambridge and its setting.

The supporting text of the policy has been updated to reference the Green Belt Study Review in relation to grey belt. It is not necessary for the policy to repeat national policy regarding the application of Green Belt / grey belt for development management.

Justification has been identified for the release of Green Belt land at Cambridge Biomedical Campus and at the Babraham Research Campus. Outside those areas exceptional circumstances for other Green Belt release has not been identified. Proposals for new Green Belt to be designated would have to meet NPPF (2024) paragraph 144. Given the location of Cambourne relative to Cambridge, it is not considered there is a case to extend the Green Belt.

Whilst a draft allocation was identified at Mingle Lane in Great Shelford in the First Proposals, reasons for its removal from the Draft Plan were provided. There remain no exceptional circumstances for its release. A representation proposes adding to the Green Belt in this location, however the boundary is considered to be correctly drawn.

In terms of comments received protecting or promoting particular sites in the Green Belt, the selection of sites for allocation has followed a rigorous process in the HELAA. The HELAA takes a 'policy off' approach to the Green Belt and considered all sites whether they are in the Green Belt or not. The consideration as to whether a site is suitable for release from the Green Belt is part of the wider plan making process and whether there are exceptional circumstances for this. Further detail about this process is set out in the Development Strategy Topic Paper and its Appendix 4: Revised Greater Cambridge Local Plan Green Belt considerations review (2026). More detailed responses to comments on the Green Belt Assessment and in relation to whether a site is considered to be grey belt can be found in the Greater Cambridge Green Belt Assessment Response to comments from Site Submissions Update and Draft Local Plan Consultation (2026) and also in Annex 1 of Appendix 4 of the Development Strategy Topic Paper.

Table of representations:

General

Summary of issues raised in comments	Comments highlighting this issue
Support the protection of the Green Belt and its purposes.	201014 (M Colville), 201021 (I Crowson), 201298 (N Campbell), 201551 (Stapleford PC), 201728 (Histon & Impington PC), 201916 (A Davidson), 202736 (Cambridge Past, Present and Future), 204986 (D Davies), 204642 (C Forbes-Cable), 221927 (C Newell), 211082 (The National Trust), 210896 (Great Shelford PC)
Welcome the 3 key purposes of the Cambridge Green Belt being set out in the policy. Welcome the reference to a compact city and historic core.	210087 (Historic England)
The Local Plan should be more ambitious in providing amenity space in the Green Belt.	201280 (F Samuel)

<p>We strongly support this policy and, as a rural parish, particularly value clause 1c. However, we are disappointed that clause 1 of the policy does not explicitly pick up on supporting para 2.145. Despite our parish being surrounded by Green Belt, we have very limited access to it or links between our green spaces; hence, the Stapleford and Great Shelford Neighbourhood Plan (Policy S&GS 19) proposes multiple new off-road routes and linkages between existing routes. It is wrong that such a basic need as access to green spaces for recreation, health and wellbeing remains aspirational unless facilitated by major development. The policy should also explicitly support the enhancement of the beneficial use of Green Belts currently in the supporting text.</p>	<p>201551 (Stapleford PC), 210896 (Great Shelford PC)</p>
<p>The policy should include explicit reference to Grey Belt, consistent with the NPPF, and identify Grey Belt land within Greater Cambridge.</p>	<p>201857 (Chivers Farms Limited), 202038 (Wimpole Associates Ltd), 204487 (Wain Estates)</p>
<p>Policy S/3 (Green Belt) must be fully aligned with Section 13 of the NPPF, which affords strong protection to Green Belt land. The Green Belt supports biodiversity, food security, climate resilience, and public health, including access to nature for disabled people.</p>	<p>208950 (CPRE Cambridgeshire and Peterborough)</p>
<p>The Green Belt is important for biodiversity and the Local Plan needs to include language that can protect it from development. The term 'exceptional circumstances' needs tightening up.</p>	<p>201916 (A Davidson)</p>
<p>Do away with the Green Belt or buy the land from private owners and prohibit crop fields and plant trees everywhere. If it's not accessible by residents, it's not a real green belt. I'd rather see the city grow, and no farms, which should be forbidden.</p>	<p>205494 (C Campos)</p>

<p>Paragraph 2.142: Does designated sites include designated heritage assets? If so, this should be made explicit with the addition of the word heritage. We recommend that you add reference to designated heritage sites.</p>	<p>210185 (Historic England)</p>
<p>The end result of the Green Belt is simply to move development further from Cambridge resulting in worse located developments for everyone. It would be better to build high quality dense, liveable suburbs (Eddington is a fairly good example) close enough to the city for people to feel part of it, and to cycle to most of their destinations, benefit from the amenities that already exist</p>	<p>203630 (H Thomas)</p>
<p>Support the inclusion of the national Grey Belt definition in the supporting text. The inclusion of Grey Belt within the NPPF and corresponding Planning Policy Guidance is a vital tool for identifying low-contribution land that should be prioritised for sustainable delivery.</p>	<p>202071 (M Asplin)</p>
<p>Policy S/GB is unsound because it does not demonstrate alignment with the February 2025 PPG, which advises authorities to identify grey belt land to inform Green Belt review. The Plan states that grey belt identification is unnecessary, yet provides no alternative explanation of how national guidance has been applied. There is a risk that lower-contributing land is overlooked. The Development Strategy also appears to have been concluded before updated Green Belt evidence is published, raising concern that the evidence base has not fully informed the plan at Regulation 18 stage. A comprehensive review of the Green Belt should be carried out to identify further sites for development in sustainable locations that can be delivered without harm to the purposes of land being designated as green belt. We would expect Greater Cambridge to update its Green Belt assessment, which currently dates from 2021, to reflect this updated policy and identify potential grey belt areas.</p>	<p>202071 (M Asplin), 202021 (M Asplin), 204246 (Bellway Strategic Land), 202038, 206077, 206088 (Wimpole Associates Ltd), 205095, 206788 (Endurance Estates), 208777 (Croudace Homes), 204990 (Martin Grant Land), 211447 (Gonville & Caius College)</p>

<p>We object to draft Policy S/GB: The Cambridge Green Belt on the basis that none of these purposes are as listed at paragraph 143 of the NPPF. Having regard to the merging of places paragraph 143 makes it clear that the purpose of the Green Belt is ‘specifically to prevent neighbouring towns merging into one another’ as opposed to ‘communities in the environs...’.</p> <p>It is notable that the policy does not reference Grey Belt, nor does the policy allow for any consideration of need or Green Belt review over the plan period. Notwithstanding, that Green Belt release has been considered acceptable to facilitate development at East Cambridge and Cambridge Biomedical Campus.</p> <p>We object to Policy S/GB: The Cambridge Green Belt on the basis that further green belt release is required to meet additional need for employment floorspace.</p>	<p>210316 (Russell Smith Farms)</p>
<p>Purpose 1c in Policy S/GB is inconsistent with the second purpose in NPPF Paragraph 143 i.e. it refers to communities and not towns and should be amended. Consistency with national policy is one of the soundness tests for local plan policies. The reference to communities rather than towns could have implications for how inappropriate development in the Green Belt is assessed and the implementation of grey belt policy at planning application stage.</p>	<p>202369 (The CLC Trust), 203898 (Hill Residential (Fulbourn Site), 202108 (Cambridgeshire County Council (Strategic Assets), 202572 (Ely Diocesan Board of Finance), 204283 (Croudace Homes), 204455 (Bellway Strategic Land),</p>

	<p>205136 (North Barton Road Landowners), 201950 (KG Moss Will Trust & Moss Family), 201971 (Shelford Investments), 204182 (Hill Residential (Hardwick Site), 204530 (Redrow South Midlands), 209967 (Granta Land Ltd), 204990 (Martin Grant Land), 211616 (Bloor Homes Eastern)</p>
<p>The Development Strategy Topic Paper indicates that the identified need for jobs and homes can be met without using Green Belt land, but a revised Green Belt Assessment is needed to inform the Draft Local Plan. There is a call for additional housing and job allocations to meet a more aspirational growth level, suggesting that full weight cannot be given to the Green Belt without considering its release.</p> <p>The omission of Grey Belt references in Draft Policy S/GB is challenged, highlighting the NPPF's and PPG's requirement to identify Grey Belt land in Green Belt Assessments. Draft Policy S/GB is viewed as inconsistent with national policy, requiring a revised Green Belt Assessment, consideration of higher growth targets, and inclusion of Grey Belt in the Local Plan.</p>	<p>204246 (Bellway Strategic Land), 204487 (Wain Estates)</p>

<p>The PPG is clear that where local authorities seek to review and alter Green Belt boundaries it is expected that authorities identify grey belt land to inform this work and prioritise development in accordance with paragraphs 147 and 148 of the Framework.</p>	<p>208907 (Nightingale Land and Hill Residential Ltd)</p>
<p>It is not evident though that the Councils have given sufficient weight to the climate crisis and housing crisis we now face (which were not material factors when the green belt policy was originally established), and these are exceptional circumstances which would justify a more flexible and permissive approach to grey belt release in particular. We understand that the Councils are undertaking a Grey Belt review which is due to be published after the Draft Local Plan consultation. It will be important to ensure that this review is published and the opportunity provided for it to be reviewed and commented upon in advance of the finalisation of the Proposed Submission Consultation (Regulation 19) scheduled for Summer / Autumn 2026.</p>	<p>209329 (St Johns College Cambridge), 211533 (Hopkins Homes)</p>
<p>We understand that the Councils are undertaking a Grey Belt review which is due to be published after the Draft Local Plan consultation. It will be important to ensure that this review is published and the opportunity provided for it to be reviewed and commented upon in advance of the finalisation of the Proposed Submission Consultation (Regulation 19) scheduled for Summer / Autumn 2026.</p>	<p>211064 (St John's College Cambridge)</p>
<p>There is some inconsistency with the wording of the 5 purposes stated in NPPF 143 a-e. The LP policy should also be expanded to include safeguarding the countryside from encroachment. The explanation should be clarified to limit exception sites to affordable housing.</p>	<p>211927 (C Newell)</p>
<p>The policy would benefit from clearer reference to how essential rural development, including farm diversification and local needs housing, can be accommodated without undermining Green Belt purposes, ensuring protection of openness alongside the vitality of rural communities. Strict application</p>	<p>203154 (Cambridgeshire ACRE)</p>

<p>without rural nuance could restrict modest community facilities, rural employment or affordable housing that supports village sustainability.</p>	
<p>The council appears not to have applied the NPPF-required hierarchy (previously developed land, grey-belt, other Green Belt) when considering releases and has not provided sufficient evidence of exceptional circumstances to justify additional Green Belt releases.</p>	205874 (British Land)
<p>Despite our parish being surrounded by greenbelt, our access to it is limited. It is wrong that such a basic need as access to green spaces for recreation, health and wellbeing remains out of reach. Green Belt should stay as Green Belt (or preferably made 'greener' by making it more biodiverse). We have just had a huge development built on what used to be actual strawberry fields but I can't see this on the map. I don't think there has been a thought to how this new development impacts on the local health services (or lack thereof) either.</p>	202677 (S Berridge)
<p>The Cambridge Green Belt aims to provide a green buffer around the city and villages to prevent urban sprawl. There is concern that the green belt is too tightly drawn around some villages, hindering small-scale developments. Small-scale appropriate developments could enhance the environment and contribute to long-term rural resilience.</p>	203071 (Little Wilbraham and Six Mile Bottom PC)
<p>We strongly encourage GCSP to approach the grey belt assessment with an open mind, to reassess existing assumptions in light of the newly defined concept of the 'grey belt' in the revised NPPF, and to explore the potential of such sites positively and strategically. Careful consideration of opportunities in grey belt areas has the potential to enable denser and more sustainable development, supporting wider social and environmental objectives of the draft Plan.</p>	203521 (Cambridge Ahead)

Welcome the commitment to an updated Green Belt Study but request that the findings be made available before the Regulation 19 consultation.	204910 (Great Shelford (Ten Acres) LLP)
It is noted that no Green Belt study has been undertaken at this stage to inform the Draft Local Plan. This is a fundamental gap in the evidence base that needs to be addressed prior to Regulation 19.	211525 (Endurance Estates)
It is considered that upward adjustments are required to the housing target, the development strategy should direct development to the more sustainable locations including on the edge of Cambridge, and there are exceptional circumstances to release land from the Green Belt	205136 (North Barton Road Landowners)
National policy does not facilitate the creation of local Green Belt purposes. The Cambridge Local Purposes do not align with the national purposes. The fact that Local Purposes have applied previously does not justify their continued application in light of changes to national context. A Green Belt review is warranted to assess land parcels against the relevant national Green Belt purposes.	203970 (Anglia Ruskin University)
The final part of Policy S/GB which states ", and having regard to the Cambridge Green Belt purposes set out above" appears to be unnecessary text.	204019 (Abbey Properties Cambridgeshire Limited)
Exceptional circumstances exist at a strategic level to justify amendments to the Green Belt by virtue of the need for the Greater Cambridge Local Plan to identify additional suitable and sustainable sites for development to meet identified needs, and subsequently directing appropriate growth to sustainable villages. The draft Greater Cambridge Local Plan currently fails to give grey belt any consideration in informing the proposed Development Strategy. Therefore, it is clear that the Greater Cambridge Local Plan needs to be informed by a full assessment of the Green Belt in light of the Government's introduction of grey belt and emerging national planning policy.	208323 (PX Land Ltd), 209327 (B Homent, J Tee and R Smith), 210300 (Northwest Biotherapeutics Capital Limited)

<p>Object to building on any more of the protected green areas of our city. Due to the enormous numbers of new houses being built on green belt sites encircling the whole of the city that should make it a priority to preserve the few green spaces within the city for mental health for all who dwell in the city and nature including bee and wildlife corridors.</p>	<p>208479 (H Belle)</p>
<p>Thakeham supports and endorses to the Government's desire to see land which does not contribute fully to the purposes of Green Belt (grey belt), make a meaningful contribution to housing supply. Whilst draft Policy S/GB is considered to align with National Policy, the Council should ensure that consideration is given to promoted sites within the Green Belt that can come forward to meet the Local Housing Need, whilst not strongly contributing to purposes a), b) or d) of the Green Belt.</p>	<p>208339 (Thakeham Homes Ltd)</p>
<p>Policy S/GB of the draft GCLP sets out the Green Belt policy for Cambridge. Paragraph 143 of the NPPF sets out the five national purposes for Green Belts. The second purpose listed in Paragraph 143 states "b) to prevent neighbouring towns merging into one another;". The third purpose for the Cambridge Green Belt in Policy S/GB states "1c. prevent communities in the environs of Cambridge from merging into one another and with the city". Purpose 1c in Policy S/GB is inconsistent with the second purpose in NPPG Paragraph 143 i.e. it refers to communities and not towns. Consistency with national policy is one of the soundness tests for local plan policies. The reference to communities rather than towns could have implications for how inappropriate development in the Green Belt is assessed and the implementation of grey belt policy at planning application stage.</p> <p>Changes to plan: It is requested that Purpose 1c in Policy S/GB is amended to refer to towns and not communities. The amended text should be as follows: prevent towns in the environs of Cambridge from merging into one another and with the city.</p>	<p>211248 (Manor Oak Homes)</p>

Areas of Green Belt

Summary of issues raised in comments	Comments highlighting this issue
If/when it is necessary to release less critical parts of the Green Belt for development, compensatory improvements and countryside enhancement/biodiversity enhancement should be concentrated in the more critical remaining parts of the Green Belt especially those that already have existing enhancement initiatives that can be joined up to landscape scale such as the Magog Hills south of the town.	201185 (M Foote)
It is important that the Green Belt around Fen Ditton and Horningsea is maintained. It is so important for residents from all over Cambridge as part of the Green lungs of Cambridge and important recreational space.	207352 (L Woolfenden)
The Green Belt boundary is too tight around Great Wilbraham village, mainly following property boundaries. The nearest properties in Fulbourn are 1.5 miles from the edge of Great Wilbraham. Some development on plots within the relatively open structure of the village is very far from the 'ribbon development' which the Green Belt is designed to prevent.	203349 (Great Wilbraham PC)
We would like to explore the possibility of having a green belt with statutory status and of sufficient depth between Cambourne North and the villages in order to better protect the villages against coalescence.	202126 (Elsworth PC), 202350 (P Deer)
It is important to maintain the Green Belt, in particular, the West Fields to retain decent walks and the clear views from Red Meadow Hill towards Cambridge	202425 (Residents Association of Old Newnham – RAON)

<p>A key purpose of the Green Belt is to maintain physical separation and open countryside between settlements. There is still a small area of open undeveloped rural land at the boundary between Great Shelford and Stapleford that is not currently assigned as Green Belt. The policy map showing the Green Belt should be updated to include this parcel since it is vital, since, it alone, will serve the purpose of preventing the urban sprawl completely connecting the two settlements.</p>	203068 (M Foote)
<p>There are sites that are allocated as green belt that are not in fact but already in the village envelope. These areas of green belt do not tick the boxes of your description of green belt so i suggest they are released. We have one such site in the middle of a village. It was to be released in earlier stages of this plan but has been removed in this stage. The Walled Garden, Whittlesford CB22 CB280901. Please release it from greenbelt.</p>	204642 (C Forbes-Cable)
<p>Support for small-scale development where infrastructure exists, provided it does not harm surrounding rural areas or increase the risk of village merging.</p> <p>The site land registry CB280901 in Whittlesford was previously included in the local plan for sensitive development but has been removed in the latest plan despite it meeting the criteria of sustainable sensitive development.</p>	205473 (L Gardner)
<p>Retain land in the Green Belt subject to Policies S/CBC & S/SEA/CBC, as there is a surplus supply of Offices/R & D floorspace identified in the Employment & Housing Needs Assessment and the loss of 22 hectares of Green Belt is not justified.</p> <p>There is a need to mitigate the loss of Green Belt, both from the loss of Green Belt in the adopted Local Plan at CBC, & for the 22 hectares to be deleted from the Green Belt. NPPF Green Belt Policy requires</p>	204790 (R Turnbull)

measures to enhance opportunities for recreation. This should be achieved by increasing the area of Wandlebury Country Park & the Gog Magog Country Park towards Stapleford and between CBC and Great Shelford.	
The respondent supports the government's reforms of the NPPF regarding the modernisation of green belt policies, specifically the identification of 'grey belt' land for potential development. The respondent argues for greater flexibility in permitting development on low-quality green belt land to boost housing supply, highlighting Histon and Impington as a sustainable location due to its transport connectivity.	204990 (Martin Grant Land)

Sites

Summary of issues raised in comments	Comments highlighting this issue
West Fields Strongly support the decision not to develop the Green Belt land known as the West Fields and to retain this important part of the Green Belt, which allows views from the west.	208486 (C Johnson), 203282 (J Palmer)
Mingle Lane – Site S/RSC/HW Strong support for the land marked S/RSC/HW on the Greater Cambridge Local Plan to be retained as Green Belt. The existing Greater Cambridge Local Plan had identified this land as being suitable for release from the Green Belt, but that the consultation in 2021 showed unanimous objection to this release - the only voices in favour were from the land owner and the developers and their representatives.	208497 (R White), 208499 (H White), 208882 (C Bendelack)

<p>The extensive allocations for new housing in other areas of South Cambridge, including Cambourne, Grange Farm, Bourne, Hinxton and others render the need for this exceptional release of Green Belt redundant. Release of this Green Belt would also destroy the natural environment it was instituted to protect. In our garden, backing onto the area, we routinely have visits from deer, foxes, badgers, squirrels, sparrow hawks, green woodpeckers and many other species, all of which would suffer from the proposed developments.</p>	
<p>Cambridge Biomedical Campus</p> <p>The Landowners' proposed southern entrance to the CBC should be humble, unobtrusive and carefully landscaped so as not to add to the Very High Harm the CBC would be doing to the Green Belt. We are strongly opposed to a prominent gateway being created in this location. If agreed, it should be unobtrusive and blended into the landscape of Cambridge City edge.</p> <p>Great concern at the open-ended position the CBC has taken on this crucial matter - by, we propose, making it abundantly clear that if a further extension of the CBC into the Green Belt were to be agreed in the 2025-2045 Greater Cambridge Local Plan, it would be conditional on a CBC Landowners' contractual commitment to make no further bids in the future for yet more land to be taken out of our precious and diminishing Green Belt. Unless the Landowners agree to that condition, the proposed Phase 4 addition to the CBC should not be agreed.</p>	<p>208745, 208746 (Trumpington Residents Association)</p>
<p>Mingle Lane – Site S/RSC/HW</p> <p>NLHRL have land interests in Great Shelford (land at Mingle Lane) and are promoting the site for residential development for approximately 110 dwellings. The site was originally identified as a</p>	<p>208894, 208907 (Nightingale Land and Hill Residential Ltd)</p>

<p>preferred option for development at the 'First Proposals' stage of the GCLP under site reference "S/RSC/HW" accommodating approximately 100 dwellings. Nightingale Land have acquired additional land to the north that could increase the development potential of the site to approximately 190 dwellings. The site has subsequently been removed from the current consultation following the identification of land at Grange Farm.</p> <p>The site meets the Grey Belt criteria and sustainability of the site remains unchanged from the Council's initial identification of the site. The site should be reintroduced as an allocation.</p>	
<p>Site 59410</p> <p>Exceptional circumstances exist to justify removal of the Green Belt designation from the remainder of site 59410. The Council's 2021 Green Belt Study identifies a weak physical distinction from Horningsea, limited countryside views, and only minor harm arising from release, with the site making a limited contribution to Green Belt purposes. The current boundary is arbitrary, bisects a single enclosed planning unit, and undermines design-led outcomes. Correcting the Green Belt boundary, alongside inclusion within the DDE, would create a clear, permanent and defensible boundary, support sustainable small-site delivery, address identified supply shortfalls, resolve acknowledged policy tension, and provide long-term certainty.</p>	202036 (M Asplin)
<p>Site 115407</p> <p>Advocate for a site-specific exception for Site ID: 115407 for commercial and recreational use. Recent consultation indicates strong community support, with 71% of residents backing the proposal for high-quality recreational space.</p>	201728 (Histon & Impington PC)

<p>The strategic release of this Green Belt parcel should be seen as a net benefit to the community. The site is well positioned for sustainable development due to exceptional connectivity via Guided Busway routes and surrounding bus services. We advocate for consolidated, high-impact employment hubs similar to the Cambridge Science Park, rather than smaller developments. Proposal includes a dedicated Country Park and diverse employment opportunities, offering greater long-term community value than its current designation.</p>	
<p>Woodcock Close, Impington</p> <p>Concerns are raised regarding the dated Green Belt Assessment and the lack of commitment to review Grey Belt sites, which are becoming increasingly relevant in planning policy. It is recommended that the Plan Policy (S/GB) explicitly references Grey Belt and includes the identification of Grey Belt land within Greater Cambridge, aligning with NPPF requirements. To ensure the Local Plan's longevity, a revised Green Belt Assessment should be conducted in accordance with Appendix E of the NPPF 2025.</p>	<p>201857 (Chivers Farms Limited)</p>
<p>Rectory Farm - 2025 Call for Sites Ref 222cfe</p> <p>Grey Belt Land should be identified within the revised Green Belt Assessment and Draft Local Plan. The Council needs to properly consider the inclusion of well-performing sites in the Grey Belt such as Land Adjacent to A1303 and M11, Rectory Farm.</p>	<p>202038 (Wimpole Associates Ltd)</p>
<p>Site 40271 Land East of Balsham Road in Fulbourn</p> <p>This site would meet the definition for grey belt land, as set out in Chapter 13 and Annex 2 of the NPPF and in Section Id.64: Green Belts of the Planning Practice Guidance. The site does not strongly contribute towards Green Belt purposes (a), (b), or (d). The promoted development would not lead to the unrestricted sprawl of a large built-up area, it would not result in the coalescence of neighbouring</p>	<p>203898 (Hill Residential (Fulbourn Site))</p>

<p>towns, and it would not affect the setting and special character of a historic town. The site is not designated as a protected area, other than being within the Green Belt. Fulbourn provides a range of services and facilities and employment opportunities, and is accessible by sustainable modes of transport. A Landscape Capacity and Grey Belt Assessment (tor & co, February 2025) was included with the updated Call for Sites submission in March 2025. It is considered that this would fall within the definition of grey belt land, and should be released from the Green Belt to meet development needs.</p>	
<p>Evolution Business Park and associated land, Milton Road, Cambridge submission To realise the Site's potential to expand its employment generating capabilities as an Established Employment Area, it should also be released from the Cambridge Green Belt, especially as it comprises previously developed land. Given the Site's existing built form, it does not make a positive contribution to the purposes of the Cambridge Green Belt and should duly be released to facilitate future development of the Business Park.</p>	206951 (Cambridge Reality Limited)
<p>GTSA Site, Great Shelford 115766 Concerns are raised regarding compliance with NPPF paragraph 23, suggesting that additional sites are necessary to meet housing needs by 2045. The respondent advocates for a higher buffer in the growth strategy to support local jobs and meet housing needs, particularly for specialist and older persons' housing. This should be met on smaller non-strategic sites in a highly sustainable location such as Gt Shelford</p>	204910 (Great Shelford (Ten Acres) LLP)
<p>Cambridge South Cambridge South represents a unique opportunity to deliver housing to meet a broad range of needs but specifically those of the Biomedical Campus in line with national policy. It is</p>	208212, 208215 (Pigeon Land & LIH)

<p>eminently deliverable; unencumbered by existing uses or landownership complications. It's clearly defined physical boundaries mean it is a clear grey belt site, which can be planned as a sustainable extension of the city. Sites on the edge of Cambridge have a track record of delivering high quality development. Cambridge South would be the next success story and there are demonstrable exceptional circumstances to justify its release from the Green Belt. It is considered that Cambridge South complies with these criteria and would (under the draft NPPF) therefore not represent inappropriate development in the Green Belt. Whilst it is against the 2024 version of the NPPF that the dGCLP is being prepared, the draft is already a consideration and will become even more material when it is adopted. Any spatial strategy that involves the consideration of Green Belt land would be remiss not to consider the implications of grey belt and of the draft NPPF's definition of what would not be inappropriate development in the Green Belt and the more near-term impact on development management this will have.</p>	
<p>Land north of Long Road, 'Darien Meadow'</p> <p>The Site is currently designated as Green Belt, but recent national policy changes regarding 'grey belt' have not been incorporated, leading to a flawed assessment. The site is grey belt land for decision-taking purposes.</p> <p>The Development Strategy Topic Paper indicates a future Green Belt Assessment, but this should have informed the Draft Local Plan due to significant policy changes.</p>	<p>204131 (Emmanuel College (Long Road))</p>

<p>To ensure the Plan is sound, a revised Green Belt Assessment should be published, higher growth scenarios considered, and grey belt land identified for sustainable development.</p>	
<p>Land west of Duxford Road</p> <p>The site should be allocated for development in the emerging Plan as it meets the criteria for grey belt land as per the Planning Practice Guidance (PPG, February 2025); the submitted Landscape and Visual Assessment demonstrates that Land west of Duxford Road does not contribute to the purposes of the Green Belt, thus supporting its classification as grey belt land. The site is not affected by Footnote 7 designations, confirming its eligibility for grey belt classification and potential for development.</p>	<p>204283 (Croudace Homes)</p>
<p>Foxton</p> <p>The government's reforms to the NPPF in December 2024 modernised green belt policies, allowing development on low-quality 'grey belt' land, which may include the respondent's client's site at Foxton. There is a need for greater flexibility in permitting homes on sites near well-connected rail stations, as the client's site meets these criteria and has good cycle connectivity to employment areas. A thorough green belt review is essential for the Local Plan process to ensure the development strategy for Greater Cambridge is based on an accurate assessment of land contributions to green belt purposes. Draft Policy S/GB diverges from the NPPF, particularly in criterion c), which aims to prevent merging of communities around Cambridge, whereas the NPPF focuses on preventing merging of neighbouring towns.</p>	<p>204306 (R2 Developments Ltd)</p>
<p>Land at Girton Road, Girton</p>	<p>204487 (Wain Estates)</p>

<p>Please see attached a Green Belt Study for Land at Girton Road, Girton, which details how the site is classified as Grey Belt due to its weak contribution to Green Belt purposes. The study indicates that development on this site would not significantly impact the gap between Girton and Histon.</p>	
<p>Comberton</p> <p>The respondent highlights that the government's reforms to the NPPF in December 2024 allow for development on low-quality 'grey belt' land, suggesting their client's site at Comberton may qualify.</p> <p>They argue for greater flexibility in permitting homes on sites near Minor Rural Centres to support the government's aim of boosting housing supply.</p>	<p>204498 (Beechwood Estates Ltd)</p>
<p>Land east of Hauxton</p> <p>The respondent argues that the land east of Hauxton should be released from the Green Belt, as it is categorised as 'grey belt' and makes a limited contribution to Green Belt purposes, thus supporting the deliverability of the emerging GCLP. Redrow highlights that the proposed site can address unmet housing needs and is well-connected to local services, schools, and transport corridors, making it suitable for development. The Green Belt and its purposes should be subject to review around Hauxton.</p>	<p>204530 (Redrow South Midlands)</p>
<p>Quy Tech site, Stow-cum-Quy</p> <p>The respondent objects to draft Policy S/GB, stating it does not align with the National Planning Policy Framework (NPPF) and fails to consider Grey Belt land or the need for Green Belt review.</p> <p>It is argued that the Quy Tech site does not significantly contribute to the purposes of the Green Belt, as</p>	<p>204809 (Quy Tech Ltd on behalf of landowners)</p>

<p>it would not lead to urban sprawl or the merging of towns, and would not impact Cambridge's historic setting.</p> <p>The respondent suggests that the development of the Quy Tech site would have the least impact on sensitive Green Belt land compared to other nearby sites, advocating for its removal from the Green Belt.</p>	
<p>Land South of Shelford Road, Fulbourn, site 51610 / 115137 in the HELAA.</p> <p>Policy S/GB and the Green Belt Assessment (2021) conclude that there is no need to release the green belt, as 'exceptional circumstances' are not present. The new site allocations are deemed unsustainable as they are located far from Cambridge Centre, potentially increasing reliance on private cars, conflicting with NPPF paragraphs 110 and 115. The Sustainability Appraisal 2025 notes that development beyond the green belt may lead to increased vehicle travel due to poor proximity to existing services and jobs.</p> <p>The respondent argues that Land South of Shelford Road, Fulbourn qualifies as Grey belt under NPPF paragraph 143, and its release would not affect neighbouring towns or historic character, warranting its allocation for smaller sites.</p>	204973 (Miller Homes)
<p>Teversham</p> <p>The respondent indicates that the client's site at Teversham may be classified as 'grey belt' due to its poor performance against green belt purposes, suggesting it could be suitable for development. The</p>	205054 (G Robinson and Partners)

<p>respondent argues for greater flexibility in permitting development on grey belt land to support the government's aim of increasing housing supply, highlighting the site's connectivity to Fulbourn and Cambridge.</p> <p>A thorough green belt review is recommended as part of the Local Plan process to ensure the development strategy for Greater Cambridge is based on an accurate assessment of green belt contributions. The respondent points out a divergence in Policy S/GB, specifically criterion c), which should be amended to align with the NPPF by preventing communities in the environs of Cambridge from merging with the city. A further recommendation is made for a comprehensive review of the green belt to identify additional sustainable development sites that do not compromise the purposes of green belt designation.</p>	
<p>Site 40509 on Babraham Road</p> <p>The Green Belt assessment underpinning the Local Plan is not sufficiently robust. Site 40509 on Babraham Road has been excluded solely due to its Green Belt designation, despite being adjacent to an allocated site, close to a proposed transport hub and located within a highly sustainable village. Evidence shows the site does not contribute strongly to Green Belt purposes and that any landscape harm could be mitigated. The assessment also fails to reflect the delivery of CSET, which would make the site infill. As a result, less suitable sites are allocated, contrary to the Plan's sustainability objectives.</p>	203905 (Waterbeach Instruments Ltd)
<p>Land off Beach Road, Cottenham</p> <p>It is clear that the Greater Cambridge Local Plan needs to be informed by a full assessment of the Green Belt in light of the Government's introduction of grey belt. Given that the previous assessment of</p>	208777 (Croudace Homes)

<p>land off Beach Road, Cottenham concluded that it does not strongly contribute to any of purposes (a), (b), and (d), there is a strong case that the land should be designated as grey belt, and thus suitable for development.</p>	
<p>South East Cambridge</p> <p>It is considered that the approach taken by Greater Cambridge is fundamentally incorrect, including failing to consider the potential for Grey Belt sites to accommodate growth. As both the NPPF and PPG identify clearly, a full Green Belt review should be undertaken in authorities where Green Belt release is required to fulfil development needs. The development of some Green Belt sites on the edge of Cambridge such as South East Cambridge would lead to more sustainable forms of development through shortened commuting distances and prevalence of public transport options than strategic growth options beyond the Green Belt. Therefore, the approach taken on Green Belt land is currently incomplete, including failing to consider the availability of Grey Belt land on the edge of Cambridge.</p>	<p>209690 (CEG Land Promotions Ltd)</p>
<p>South of Oakington Road, Cottenham</p> <p>The respondent believes that a revised Green Belt Assessment should have been completed and published as part of the consultation process, as it may change the context for considering Green Belt land release.</p> <p>The omission of 'Grey Belt' references in Draft Policy S/GB is challenged, as the NPPF mandates its identification in Green Belt Assessments, and the respondent recommends its inclusion in the Local Plan.</p> <p>Draft Policy S/GB is inconsistent with national policy and calls for a revised Green Belt Assessment,</p>	<p>203172 (Christ's College)</p>

<p>consideration of higher growth targets, and inclusion of Grey Belt land. The respondent suggests that the Council should engage more effectively with Green Belt issues to form a sustainable spatial strategy and considers the inclusion of well-performing Grey Belt sites essential.</p> <p>The respondent points to a specific site, South of Oakington Road, Cottenham, as a low-impact Green Belt land that should be released to support sustainable development in line with NPPF guidelines.</p>	
<p>Land East of Bridge Road, Impington</p> <p>The respondent considers that the site is Grey Belt and also in a sustainable location and that there are exceptional circumstances to justify the alteration of the Green Belt to include the release of sites such as Land East of Bridge Road, Impington. Survey work and engagement is being undertaken to demonstrate the deliverability of safe, convenient access to the Site.</p>	210440 (Barratt Redrow)
<p>South West Cambridge (HELAA Ref. 52643)</p> <p>It is widely accepted that Cambridge is tightly bound by Green Belt which constrains new development and expansion of the city. The NPPF guides that Green Belt boundaries should only be altered in exceptional circumstances, any changes to Green Belt boundaries should endure beyond the plan period. The priority for the release of land from the Green Belt should be previously developed land, grey belt land, and then other Green Belt locations. The need to promote sustainable patterns of development should also be considered when deciding on land to be released from the Green Belt. This approach would limit the need to travel, offer a choice of transport modes, reduce congestion and emissions, and improve air quality and public health.</p>	206825 (North Barton Road Landowners Group)

<p>It is considered that exceptional circumstances exist to release land from the Green Belt through the Greater Cambridge Local Plan process, which are related to housing and affordable housing needs and economic growth.</p>	
<p>Sites at Park Farm, Histon</p> <p>Section 13 of the NPPF requires Green Belts to be reviewed as part of the plan making process and encourages the use of previously developed land and grey belt where this aligns with the promotion of sustainable development and the development strategy. Paragraph 155 confirms the circumstances where the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate and paragraph 156 sets out the Golden Rules which apply to land proposed for release from Green Belt for housing. The NPPF also indicates that significant weight should be given to development proposals which comply with the "Golden Rules" set out for grey belt development.</p> <p>The amendments introduced by the revised NPPF to Green Belt policy, and particularly the assessment of Grey Belt, mean that this site can now be positively assessed.</p>	<p>208387 (NIAB Trust)</p>
<p>Land at Fen Ditton</p> <p>We would highlight that there is currently not an up-to-date Green Belt Assessment provided within the Local Plan evidence. These representations set out the findings of a Green Belt Review, which demonstrates that Land at Fen Ditton performs weakly against the purposes of the Green Belt set out within draft Policy S/GB and that its consideration as Grey Belt would not undermine the overall integrity or function of the Cambridge Green Belt.</p>	<p>210229 (Vistry Group)</p>

<p>Changes to plan: Release Land at Fen Ditton from the Cambridge Green Belt and incorporated within the settlement boundary of Fen Ditton through its allocation.</p>	
<p>Cambridge Science Park North (HELAA Reference 40096)</p> <p>A Green Belt Review has been undertaken for the land promoted as Cambridge Science Park North (HELAA Reference 40096). The Green Belt Review highlights that the site could be considered "grey belt" land.</p> <p>Consideration is needed for the exceptional circumstances that exist to release Green Belt land for allocation as part of the Local Plan, particularly to meet the sub-region's mid-tech floorspace needs.</p>	<p>211485 (Trinity College (CSP) Limited)</p>
<p>Swans Corner, Whittlesford (HELAA Reference 208803)</p> <p>We consider that 'exceptional circumstances' exist to justify a review of the Cambridge Green Belt boundary through this Local Plan process, and the subsequent release of land adjacent to Swans Corner. Please refer to the maps within the accompanying attachments for further clarification.</p> <p>We consider that the National Planning Policy Framework (NPPF) has changed policies that affect the Green Belt. Local planning authorities are now required to meet their objectively assessed housing needs. The Green Belt boundary should be consistent with the overall development strategy and with the principles of sustainable development.</p>	<p>2011691 (native land)</p>
<p>The extent and removal of Green Belt land at Babraham Hall should be reviewed as it does not provide space for development that could not be accommodated elsewhere with less impact on the openness, countryside and environment.</p>	<p>211931 (C Newell)</p>

Policies Map

Summary of issues raised in comments	Comments highlighting this issue
The draft Policies Map is incorrect in that it does not accurately depict the greenbelt boundary to the east of Stapleford. The map needs amending to show land removed from the greenbelt and now occupied by Strawberry Fields retirement care village on Haverhill Rd, Stapleford.	201551 (Stapleford PC)

Green Belt Assessment

Summary of issues raised in comments	Comments highlighting this issue
The purposes in the Greater Cambridge Green Belt Assessment do not address the fundamental aim in para 142 of the NPPF to "to prevent urban sprawl by keeping land permanently open". The methodology does not include a harm assessment for village of Stapleford but seems to have "merged" it with our neighbouring village of Shelford which is one of the outcomes that the methodology is seeking to prevent.	201168 (M Foote)
This policy is supported by a 2021 harm assessment methodology that is flawed because it is based on some Cambridge specific purposes alone and does not reflect the national planning policy framework. We welcome the fact that this methodology is currently under review and due to be re-issued this year (2026)	203091 (M Foote)

Attached document provides a detailed critique of the current methodology including the apparent omission of the village of Stapleford in its harm assessments.	
The NPPF (2024) introduced a clear duty for Green Belt land to be identified when undertaking Green Belt Assessments for the purposes of determining applications; reinforced within the Planning Practice Guidance (PPG) (Para 001 ref.001 64-001-20250225). The direction of travel towards authorities being required to identify Green Belt land within local plans is further evidenced within the Consultation Draft NPPF (2025)(GB2[3]) and at Appendix E where the criteria for undertaking Green Belt Assessments is outlined. To ensure the longevity of the Local Plan, it is recommended the revised Green Belt Assessment is undertaken with regard to Appendix E of the NPPF 2025.	201857 (Chivers Farms Limited), 202038 (Wimpole Associates Ltd)
The revised Green Belt Assessment should have informed the Draft Local Plan and been published as part of the Regulation 18 Consultation.	202038 (Wimpole Associates Ltd)
It is important for the Green Belt Assessment to be updated or this will undermine the plan. An up-to-date Assessment is needed to provide a qualitative assessment of the purposes and functions of the Cambridge Green Belt, and given the current pressures and contexts, demonstrate its relevance to the setting of the historic city.	202736 (Cambridge Past, Present and Future)
Current Green Belt Study is out of date and not representative of the current position in terms of policy (noting the introduction of grey belt) or in terms of growth targets which underpin the Local Plan. The revised Green Belt Assessment has not been published for consultation in support of the Local Plan and as such the GCSP's approach to allocating and discounting sites for release within the Green Belt is unclear.	201688, 205873 (British Land)

<p>It is understood that a revised Green Belt Assessment will be published after the Regulation 18 Consultation closes, however this should have informed the Draft Local Plan and been published as part of the Regulation 18 Consultation.</p> <p>Also, the omission of any reference to 'Grey Belt' within the Draft Policy S/GB is challenged. The NPPF (2024) introduced a clear duty for Grey Belt land to be identified when undertaking Green Belt Assessments for the purposes of determining applications; reinforced within the Planning Practice Guidance (PPG) (Para 001 ref.001 64-001-20250225). Identifying Grey Belt land within the revised Green Belt Assessment and Draft Local Plan is hence both a policy requirement and crucial to ensuring the Local Plan promotes sustainable patterns of growth (as required by the NPPF). The Council needs to properly consider the inclusion of well-performing sites in the Grey Belt. For example, Land to the South of Station Road, Harston (ref: 115742) was assessed within the Council's Green Belt Assessment (2021) which supported First Proposals (2021) Draft Local Plan (Parcel HS9).</p> <p>Changes to plan: To ensure that the Plan is sound will require:</p> <ul style="list-style-type: none"> - The publication of a revised Green Belt Assessment to support the Local Plan - A consideration of higher growth targets and subsequent review of the Green Belt / Grey Belt where necessary. - The identification and inclusion of the Cambridge Grey Belt within the Local Plan to guide development to sustainable Grey Belt sites. 	<p>203419, 203397 (Jesus College)</p>
<p>LSH agrees with this Policies alignment with National Policy within the NPPF relating to Green Belt release on sites that accord with the Golden Rules.</p> <p>As previously stated above, the Greater Cambridge Green Belt Assessment Final Report August 2021</p>	<p>211233 (Living Space Housing)</p>

reviewed this site for Green Belt release and it was concluded that the site makes limited contributions to the overall Green Belt and could be potentially released with minimal impact.	
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Policy S/MO: Monitoring

Abbreviations

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

Summary of issues arising from Draft Local Plan representations:

There was broad support for the need to monitor annually.

Comments were made mainly from Savills, in regard to the review of the Local Plan in relation to housing and economic floorspace land supply, and whether an earlier trigger point is needed where there are issues with land supply. It is an issue that there are not specific enough outcomes of non-compliance with the trigger points set out in the policy.

Concerns were raised in relation to climate change and holding developers to account, and there is a gap regarding renewable energy generation and space heating demand. In a similar vein, Biodiversity Net Gain and aspirations for higher standards also need to be properly monitored and enforced over the lifetime of development.

Concerns were also raised about the timely delivery of infrastructure and the monitoring of infrastructure delivery is sufficient so that it is delivered prior to the completion of homes. Concerns were also raised about the lack of rurally specific impacts.

Concerns were raised from local residents, Create Cambridge and Cambridge Junction about making sure cultural provision is reflected in the monitoring of delivery of the Local Plan.

Further responses objected to the wording of the policy because it lacks clarity on how monitoring outcomes will inform decision making.

Further comments were made about the lack of monitoring of affordable housing and the allocation of new sites being an action to mitigate this.

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 Monitoring policy and Appendix F Monitoring Framework have been reviewed to ensure it remains relevant and an accurate reflection of the strategy and content of the Local Plan at the Regulation 19 stage. Appendix F Monitoring Framework sets out how monitoring outcomes will inform decision making and reviews of local planning policy going forward. The indicators in the monitoring framework apply to rural and urban areas, the monitoring of homes, employment, greening and infrastructure will be consistently completed across rural and urban areas.
- The policy itself remains unchanged after a review of comments because the review approach taken in this policy remains sound in the context of any changes to the Local Plan. The policy has been reviewed by officers for clarity, and this has resulted in some minor changes for grammar.
- Appendix F Monitoring Framework has been updated to reflect any modifications to policy wording that have arisen from the updating of policy. This includes urban greening, 20% biodiversity net gain, accessible open space requirements for residential and commercial uses, and cultural provision. Infrastructure delivery will be monitored through the IDP and with third party stakeholders delivering the infrastructure to ensure these are made in a timely manner.
- Modifications to Appendix F Monitoring Framework have been made following representations from local residents on the need to monitor space heating demand and renewable energy generation. In response to Create Cambridge, local residents and Cambridge Junction, cultural provision has been included as a monitoring indicator.

- Parishes will not be included in the review of monitoring indicators directly as this is the responsibility of the Local Planning Authority. However, there will be an opportunity to comment and engage with the outcomes of the review of the Local Plan through consultation on responses to the reviews, such as consultation on new policy and processes. Affordable housing is monitored in indicator M25E, and the review of the Local Plan will include a Call for Sites where appropriate. Windfall housing is monitored through the annual update to the housing trajectory which informs the number of completions of homes which is monitored in the monitoring framework.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Inclusion of Parishes in the review of the monitoring indicators.	202351 (P Deer), 202128 (Elsworth PC)
Create Cambridge are asking that creative Industries data is disaggregated from the Cultural Sector in future monitoring, that assumptions about resilience and commercial success are tested separately for cultural infrastructure and that use of the Create Cambridge Insights Report is included as evidence.	202062 (H Chamberlain), 202150 (Cambridge Junction), 202316 (Cambridge Junction), 202320 (Cambridge Junction / Create Cambridge), 202205 (H Tam), 202398 (J Webber), 202418 (T Shaw),

	<p>202467 (K Jones), 202691 (T Altmann), 202721 (W Townsend), 202764 (Cambridge Junction / Create Cambridge), 202790 (S Lee), 202889 (Cambridge Junction), 202892 (Cambridge Junction), 202942 (R Terry), 202966 (T Flinders), 203367 (N Ellis), 203447 (S Ashworth), 203479 (L Heap), 203548 (D Lever), 203637 (University of Cambridge), 203856 (N Yeni), 203877 (University of Cambridge), 204416 (New International Encounter), 204719 (A Giarlis), 204856 (L Matthews), 205007 (Wysing Arts Centre), 205068 (University of</p>
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	<p>Cambridge), 205128 (H Paterson), 205217 (J Walsh), 205329 (A C de Azevedo Lamha), 205366 (L Howse), 205372 (N Oakley), 205419 (Cambridge Junction / Create Cambridge), 205427 (A Seiglow), 203121 (The Arts Theatre Cambridge), 204188 (Cambridge Junction/Create Cambridge), 204188 (Cambridge Junction / Create Cambridge), 202330 (Cambridge Junction / Create Cambridge) 202892 (Cambridge Junction)</p>
<p>Timely provision of infrastructure, usually available before dwellings are occupied, is critical to successful placemaking and should be a priority. Monitoring must be backed up with resourced enforcement if infrastructure is not brought forward as agreed.</p>	<p>202826 (Cambridge City Council Liberal Democrat Group)</p>

<p>The monitoring set out for Policy CC/NZ is insufficient. It is missing space heating demand, on-site renewables and lifecycle carbon requirements.</p>	<p>202878 (M Cleminson), 202611 (C Pointon)</p>
<p>The monitoring approach is clear, but it does not specify how rural impacts will be tracked. There are no explicit measures for rural service access, transport availability, digital connectivity or delivery of rural exception housing.</p>	<p>203155 (Cambridge ACRE)</p>
<p>Monitoring must ensure that the positive intentions in e.g., Policy BG/TC (such as the 30% minimum gain in tree canopy) is properly supported, monitored and properly enforced over the lifespan of the long-lived trees.</p>	<p>201664 (J Neal)</p>
<p>The respondent objects to the wording of Policy S/MO, stating it requires modifications to ensure effectiveness and adaptability to changing circumstances.</p> <p>Policy S/MO lacks clarity on how monitoring outcomes will inform decision-making, risking its effectiveness in addressing delivery shortfalls or unforeseen constraints. It is requested that Policy S/MO is modified to clarify how monitoring outcomes will be used to inform decision-making during the plan period; and explicitly acknowledge the need for flexibility where monitoring identifies delivery risks or shortfalls.</p>	<p>204183 (Tritax Big Box Developments)</p>
<p>Support for annual monitoring.</p>	<p>204643 (C Forbes-Cable)</p>
<p>The respondent strongly objects to Draft Policy S/MO, citing a lack of specific consequences and timeframes for unachieved housing and employment policies.</p>	<p>205039 (Endurance Estates)</p>
<p>The respondent acknowledges Appendix F (Monitoring Framework) but finds the wording of Policy</p>	

<p>S/MO insufficiently specific regarding triggers and consequences for policies not being achieved.</p> <p>The respondent criticises the current wording as subjective, and it implies a judgement from the Council on the timeliness of policy implementation.</p>	
<p>How can we avoid developers rowing back on environmental standards? The council has strict monitoring and policy control standards and environmental standards are central to that.</p>	210303 (Rustat Neighbourhood Association)
<ul style="list-style-type: none"> • The respondent objects to the policy wording, stating it requires modifications to ensure effectiveness and adaptability to changing circumstances. • The respondent cites NPPF 2024 Paragraph 86 (e) and NPPF 2026 Policy E1, emphasising the need for flexibility in planning policies or commitment to action when development delivery falls behind anticipated trajectories or relies on limited large sites. • Policy lacks clarity on how monitoring outcomes will inform decision-making • The absence of a clear mechanism for responding to delivery issues may hinder development, risking the Local Plan's objectives and economic growth. • The respondent argues that Policy does not adequately link monitoring outcomes to corrective actions, undermining effectiveness. • requests Policy be modified to clarify the use of monitoring outcomes in decision-making and to acknowledge the need for flexibility in response to delivery risks. 	204183 (Tritax Big Box Development)
<ul style="list-style-type: none"> • Requests 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. 	208170 (Cambridgeshire Local Access Forum)

<p>Food access and affordability</p> <ul style="list-style-type: none"> ● % of households within a 10-minute walk of a “healthy food retailer” (define locally: e.g., supermarket, greengrocer, community food hub, market at least weekly). ● Number of neighbourhood centres with a weekly fresh-food offer (street market, community market or equivalent). ● Change in density of hot food takeaways within 400m of schools (or other agreed buffer), and net change in A5 uses in priority areas. ● % of major developments delivering “affordable food space” (e.g., low-rent unit(s) or peppercorn concession for social enterprise/community food). 	<p>208196 (Cambridge Sustainable Food)</p>
<p>Community food infrastructure and resilience</p> <ul style="list-style-type: none"> ● Number and floorspace (sqm) of community food assets delivered (community kitchens, food hubs, social supermarkets/co-ops, shared storage/cold chain). ● Number of community kitchens with certified/compliant fit-out suitable for training/enterprise (food hygiene compliant, accessible). 	<p>210966 (Cambridge Sustainable Food)</p>
<p>Local production and land</p> <ul style="list-style-type: none"> ● Area of BMV agricultural land (Grades 1, 2, 3a) safeguarded vs lost (net). ● Hectares of peri-urban land under active food production (commercial or community-supported) within Greater Cambridge (net change). ● Area of edible/fruit tree planting delivered (e.g., number of fruit/nut trees). 	<p>210967 (Cambridge Sustainable Food)</p>
<p>Skills, health and inclusion</p> <ul style="list-style-type: none"> ● Number of school/community settings with food growing + cooking facilities delivered through 	<p>210968 (Cambridge Sustainable Food)</p>

<p>development contributions.</p> <ul style="list-style-type: none"> ● Accessibility KPI for growing spaces: % of new food-growing sites meeting inclusive design standards (accessible paths, raised beds provision, adapted plots). 	
<p>Circular economy: waste prevention and redistribution</p> <ul style="list-style-type: none"> ● % of new non-residential food premises with compliant food-waste separation and storage (designed-in, not retrofitted). ● Tonnes of edible surplus redistributed locally per year (through accredited/community partners), and/or number of redistribution partnerships enabled by plan-led space. ● % of major developments providing on-site or neighbourhood-scale composting provision (where appropriate), with a management plan 	210969 (Cambridge Sustainable Food)
<p>Local economy and enterprise</p> <ul style="list-style-type: none"> ● Number of food enterprises supported in neighbourhood centres (start-ups, co-ops, social enterprises) and survival rate at 24 months where the Plan provides affordable workspace. ● Proportion of public-sector/community anchor procurement spent locally or a proxy such as number of anchor institutions participating in local/sustainable food procurement initiatives. 	210970 (Cambridge Sustainable Food)
<p>“Systems” Indicator - to prove the Plan is delivering a joined-up food offer.</p> <ul style="list-style-type: none"> ● % of strategic sites / major allocations delivering a Food Systems Delivery Plan (a short, standardised plan covering access, community assets, growing space, waste, and local enterprise), secured through condition/S106. 	210971 (Cambridge Sustainable Food), 210977 (Y Dignon)
<p>Food access and affordability</p> <ul style="list-style-type: none"> ● % of households within a 10-minute walk of a “healthy food retailer” (define locally: e.g., supermarket, 	206966 (Y Dignon)

<p>greengrocer, community food hub, market at least weekly).</p> <ul style="list-style-type: none"> ● Number of neighbourhood centres with a weekly fresh-food offer (street market, community market or equivalent). ● Change in density of hot food takeaways within 400m of schools (or other agreed buffer), and net change in A5 uses in priority areas. ● % of major developments delivering “affordable food space” (e.g., low-rent unit(s) or peppercorn concession for social enterprise/community food). 	
<p>Community food infrastructure and resilience</p> <ul style="list-style-type: none"> ● Number and floorspace (sqm) of community food assets delivered (community kitchens, food hubs, social supermarkets/co-ops, shared storage/cold chain). ● Number of community kitchens with certified/compliant fit-out suitable for training/enterprise (food hygiene compliant, accessible). 	206967 (Y Dignon)
<p>Local production and land</p> <ul style="list-style-type: none"> ● Area of BMV agricultural land (Grades 1, 2, 3a) safeguarded vs lost (net). ● Hectares of peri-urban land under active food production (commercial or community-supported) within Greater Cambridge (net change). ● Area of edible/fruit tree planting delivered (e.g., number of fruit/nut trees). 	210973 (Y Dignon)
<p>Skills, health and inclusion</p> <ul style="list-style-type: none"> ● Number of school/community settings with food growing + cooking facilities delivered through development contributions. 	210974 (Y Dignon)

<ul style="list-style-type: none"> ● Accessibility KPI for growing spaces: % of new food-growing sites meeting inclusive design standards (accessible paths, raised beds provision, adapted plots). 	
<p>Circular economy: waste prevention and redistribution</p> <ul style="list-style-type: none"> ● % of new non-residential food premises with compliant food-waste separation and storage (designed-in, not retrofitted). ● Tonnes of edible surplus redistributed locally per year (through accredited/community partners), and/or number of redistribution partnerships enabled by plan-led space. ● % of major developments providing on-site or neighbourhood-scale composting provision (where appropriate), with a management plan 	210975 (Y Dignon)
<p>Local economy and enterprise</p> <ul style="list-style-type: none"> ● Number of food enterprises supported in neighbourhood centres (start-ups, co-ops, social enterprises) and survival rate at 24 months where the Plan provides affordable workspace. ● Proportion of public-sector/community anchor procurement spent locally or a proxy such as number of anchor institutions participating in local/sustainable food procurement initiatives. 	210976 (Y Dignon)
<p>Appendix F – Monitoring Framework</p> <p>The actions set out in Appendix E are not quick delivery options, unlike allocating more sites which fall under the SUE threshold.</p>	208367 (Endurance Estates)
<p>While the monitoring monitors specialist housing uses, the monitoring also fails to monitor the delivery of affordable housing which should be rectified. Again, there should be levers in the local plan which can be pulled to create a timely difference in housing delivery. Sites which are in the Green Belt which come forward as Grey Belt sites have to have a higher percentage of affordable housing and therefore</p>	208368 (Endurance Estates)

allocating sites at a more modest scale would enable there to be clear and specific delivery of new affordable housing.	
Mid-term changes to the Local Plan and additional Local Plan allocated development sites seem to be proposed. That potentially redefines windfall sites as strategic sites and goes beyond the scope of a monitoring process. Site allocation should go through the proper Local Plan procedure with due public consultation.	211932 (C Newell)