

Consultation Statement

Appendix 9: Response to Representations - Biodiversity and green spaces



Greater Cambridge Local Plan

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



GREATER CAMBRIDGE
SHARED PLANNING

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

Biodiversity and green spaces

Biodiversity and Green Spaces Introduction

Abbreviations

PC= Parish Council

DC= District Council

TC= Town Council

NPPF= National Planning Policy Framework 202

LNRS= Local Nature Recovery Strategy

Summary of Main Issues:

There was broad support for the biodiversity and green space policies from a range of individuals, organisations and developers.

There was support for protecting green spaces, river corridors, and biodiversity and many respondents emphasised the importance of biodiversity as essential for climate resilience, public health and maintaining quality of life as well as environmental value. There was overall a positive response to the nature recovery ambitions and alignment with Local Nature Recovery Strategy (LNRS).

Comments recognised that the area is already nature-depleted and that too many residents lack good access to high quality green space is noted. Concerns were raised about further habitat loss, environmental degradation and that chalk streams, aquifers and water resources are under pressure with potential pollution and groundwater depletion.

Comments were made that stronger protection of existing nature is needed and concern was expressed about loss of mature trees, existing habitats and productive farmland. Comments noted that wherever possible, existing trees should be preserved and properly protected, as mature trees are essential to the landscape, wildlife habitats, and overall environmental wellbeing. There was a request that the retention of existing natural assets becomes the default approach, as new planting cannot replace established ecosystems quickly.

Others commented that the Local Plan must go beyond protecting what remains and actively restore nature, connect habitats, and safeguard them for the long term. Policy should also recognise that biodiversity and green infrastructure are essential for public health, climate resilience, and a liveable urban environment.

There was concern that there is a tension between development and nature and some respondents question whether large-scale development (e.g. housing growth) is compatible with “doubling nature”.

Limited responses identified perceived gaps in the policy approach, including suggestions that the policies seen as too focused on strategic/designated sites and that rural and landscape considerations are underrepresented with insufficient attention to farmland and working landscapes; comments highlighting the need to ensure that rural active travel routes should be bridleway to include horse riders, and comments that there light pollution impacts on wildlife were not included.

Response to the main issues raised in representations

Comments in support of the policy approaches are noted.

Comments are noted that ask for stronger protection of existing nature, including that the retention of existing natural assets becomes the default approach. The approach in all of the policies in this chapter take a protect, enhance, expand approach, such that retention of existing natural assets is the first consideration for all of the policies in this chapter, including for biodiversity, green infrastructure more widely, trees and open spaces.

To respond to the need to go beyond protecting what remains, the policies in this chapter are ambitious in seeking a significant uplift in provision of biodiversity and green infrastructure more widely, primarily through the 20% biodiversity net gain and Accessible Green Space standards set out in policies BG/BG and BG/EO respectively. Policy BG/GI requires that all green infrastructure should be multifunctional, connected, sympathetically placed, resilient, responsibly managed and environmentally sensitive.

Policies across the plan seek to balance the potential tension between significant development and the Councils' ambition to double nature. Policies in this chapter seek to maximise nature and green infrastructure gains through development, and to protect against harm to important habitats.

Policies across the plan address landscape and rural issues as well as development sites, noting that the Local Plan can only address development proposals. Policies across the plan have been reviewed to ensure they account for recreational walking and horse-riding needs including within this chapter BG/GI; light pollution impacts are addressed in relevant sites policies.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Policies protecting green and open spaces, including river corridors, are supported.	205703 (Newnham Labour)
I support the biodiversity and green space policies, including the protection of the River Corridor.	203287 (J Palmer)
Support for policy: ensuring that local biodiversity data and priorities are incorporated into planning decision making -by referencing adopted Neighbourhood Plans and local parish Biodiversity audits and action plans, as well as more strategic projects identified in the LNRS. Strong support of the high standards in biodiversity and green spaces	201380 (Gamlingay PC), 202919 (Cambridge City Council Liberal Democrat Group)
Fully applaud these policies. Developers seem to see mature trees as a constraint to development and they are removed without consideration of the climate emergency. New replacement planting will take years to contribute as effectively. All existing mature trees should be retained as the default position.	201776 (H Jackson)
Strongly support doubling nature aspiration, strongly support this, this is what many people want, all political parties at local level express support for this, really important it retains what is valuable about our area and creates an attractive place to live which is internationally competitive. Would like to see government support this is really important for the prosperity of our area, greater Cambridge must continue to be a nice place to live.	203993, 203995(Histon and Impington PC)
It is welcome that the Local Plan highlights the importance of the nature network and its alignment with the Local Nature Recovery Strategy. We support the Plan's intention to increase and improve wildlife habitats	203525 (Cambridge Ahead)

Summary of issues raised in comments	Comments highlighting this issue
<p>and green spaces for people. There is a valuable opportunity to strengthen the existing nature network and to allocate publicly accessible green space and nature recovery areas alongside other land uses, thereby supporting environmental objectives as well as placemaking, connectivity, green infrastructure, and overall quality of life.</p>	
<p>Bar Hill has it more or less right. We need a few more trees to replace the ones which have recently been cut down, but otherwise, the village has walkable, safe, green spaces, paths connecting major hubs and all the streets and a good infrastructure.</p>	201039 (P Spowart)
<p>'we want to double nature by 2050'. Don't you know, nature is not something you can order from Amazon, in the quantity you want, and install it? Who did actually come up with that phrase?! You want to build 48,000 houses and 'double nature'. You think 'nature' will actually welcome all those extra houses and that huge upheaval? Do you think nature will actually meekly fit in with your plans? You are trying to plan something that is extremely complicated and fragile in the most arrogant anthropocentric way! Do you think that muntjac deer, families.</p>	201244 (S Williams)
<p>A well-considered document - except for one glaring omission - no mention of lighting. The absence of darkness is very bad for insect life, and LED lighting is catastrophic. I have seen this over 32 years in my own garden. There was a steady but slow decline in insect life for some twenty years; then LED streetlights were installed, and now there is less than 10% of the insect life that there used to be; and thus no bats, fewer swifts, no hedgehogs. Please develop a lighting policy which will be favourable to our wildlife, in particular insect life.</p>	201276 (H Painter)

Summary of issues raised in comments	Comments highlighting this issue
<p>The Plan lacks sufficient focus on the area east of Cambridge, which includes villages like Balsham and West Wrating, highlighting its significance for green spaces and farmland.</p> <p>The area is noted for its historic rights of way, natural habitats, and a key aquifer that supports Greater Cambridge's water needs, underscoring its importance to the draft Plan's priorities.</p> <p>According to the Greater Cambridge Landscape Character Assessment, this region has a unique character that should be conserved and enhanced, yet it faces threats from the Kingsway Solar Farm proposals.</p> <p>The respondent opposes the solar farm proposals, arguing they contradict the draft Greater Cambridge Local Plan's values and pose pollution risks to the nearby aquifer due to battery storage installations.</p>	201442 (J Newton)
<p>Summary: Cambridge is growing rapidly and increasing building developments in the already very densely populated inner city areas. Green open spaces are of a premium to the well being of residents. Protected open spaces must be maintained to ensure a good quality of life for residents of Cambridge now and very importantly the future. Development should not go ahead at the expense of maintaining and cherishing protected open spaces and mitigating development by siting educational needs must be stopped so that we do not lose the few protected open spaces Cambridge has available for all residents to enjoy.</p>	201540 (N Sheffield)
<p>Cambridge Living Streets welcomes these policies and we organise walks in older and new developments to investigate green spaces. There is a balance to be struck between protecting green spaces and encouraging access to them. In one walk our helpful guide was disappointed by the lack of local residents visiting the site but looking around there was no seating and little information about what was growing</p>	201630 (Cambridge Living Streets)

Summary of issues raised in comments	Comments highlighting this issue
there. This needs to change if residents are to engage more widely with green space and not focus in (Cambridge city) on the downsides e.g. kerbside weed growth blocking drains!	
The Levelling up and Regeneration Act (2023) states that any Local Plans and Spatial Strategies must 'take into account' the relevant LNRS for the planning authority, making clear that the LNRS plays a role in place-making and planning. You state you want to "play your part" in implementing the LNRS but none of the policies set out how this ambition will be met. You could at least describe how planning would reconcile a clash between the LNRS and a proposed development.	202642 (C Pointon)
Theme would benefit from some attention to the recent UK Government report 'National security assessment on global ecosystems' - recently published, this strategic assessment explores how global biodiversity loss and the collapse of critical ecosystems could affect the UK's resilience, security and prosperity.	202652 (P Tribble)
Where are Wandlebury Country Park and Magog Downs and Stapleford Parish Pit on the Local Nature Recovery Strategy? They don't seem to be in there.	202700, 207432 (S Berridge)
Would be really good to see space for Equestrians, they provide a valuable link between the countryside and the towns. Using bridlepaths and droves as active travel. The need to provide areas of grass for grazing. Farming and agricultural economy created by the equestrian world.	202833 (S Durman)
On behalf of Little Wilbraham and Six Mile Bottom Parish Council, we support the Plan's overall approach to biodiversity and green spaces, reflecting principles long promoted within our parish. We are home to Little Wilbraham Fen, a Site of Special Scientific Interest, and are concerned it must be safeguarded from	203047 (Little Wilbraham and Six Mile Bottom PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>encroachment or nearby development that could threaten its biosecurity. At the same time, opportunities to strengthen protection, enhance biodiversity, and enable biosecure access should be explored, particularly in the context of the proposed Cambridge East development. Any approach must prioritise protection while responsibly promoting environmental enhancement.</p>	
<p>Great Wilbraham has important local green spaces and nature habitats. However, our SSSI at Great Wilbraham Common has no safe access route from the village; and the Little Wilbraham River, a chalk stream arising in Great Wilbraham is endangered by reduced water in the chalk aquifers and requires pumping to local springs at Wilbraham Temple. The GWPC is concerned that, with no local development, there will be no 'planning contributions where funding can be used to enhance the wider network' – so Great Wilbraham nature habitats will miss out. Could planning contributions be pooled and then allocated more widely?</p>	<p>203373 (Great Wilbraham PC)</p>
<p>This summary should also include reference to geodiversity.</p>	<p>203433 (Cambridgeshire Geological Society)</p>
<p>Greater Cambridge is nature-depleted and too many residents lack good access to high quality green space. The Local Plan must therefore go beyond protecting what remains and actively restore nature, connect habitats, and safeguard them for the long term. Policy should also recognise that biodiversity and green infrastructure are essential for public health, climate resilience, and a liveable urban environment.</p>	<p>203681 (Cambridge Green Party)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The respondent is part of Girton's Neighbourhood Plan team who are drafting their Neighbourhood Plan, having consulted with planning officers from South Cambs Council.</p> <p>New Local Plan's measures to protect and enhance biodiversity commended but believes an opportunity has been missed regarding local designations.</p> <p>The draft Neighbourhood Plan includes policies to protect designated 'Green corridors' (hedge lines) and 'Blue corridors' (two tributaries of the river great Ouse: Beck Brook and Washpit Brook).</p> <p>'Policy BG/RC: River corridors' welcomed but respondent requests addition of specific designations for 'Blue Corridor' and 'Green Corridor' that can be proposed by local communities as part of a Neighbourhood Plan in the same way that sites can be put forward for LGS or ICF designations.</p>	204698 (Girton Neighbourhood Plan Team)
<p>It is a serious weakness to lack an equivalent to the crucial clear Appendix I 'Table of Standards'. Key numbers and methods are spread across policies, guidance and evidence, providing less direct visibility for the most POS-deficient wards. This draft plan's wording is less focused on the ward-level deficits in Cambridge. This makes it harder even for anyone to highlight clear, plan-embedded, numeric requirements and locally targeted obligations for Public Open Space in underserved wards like Petersfield. Furthermore, the most recent ward-level data rely on the ancient 2011 Open Space and Recreation Strategy document. These serious flaws must be rectified.</p>	202169 (J Neal)
<p>It is a serious weakness to lack an equivalent to CLP2018's crucial, clear, Appendix I 'Table of Standards'. Key numbers and methods are spread across policies, guidance and evidence, providing less direct visibility for the most POS-deficient wards. This draft plan is less focused on the ward-level deficits in</p>	203594 (T Neal) 202279 (B Grieg)

Summary of issues raised in comments	Comments highlighting this issue
<p>Cambridge. This makes it harder for anyone to highlight clear, plan-embedded, numeric requirements and locally targeted obligations for Public Open Space in under-served wards like Petersfield. Furthermore, the most recent ward-level data rely on the ancient 2011 Open Space and Recreation Strategy document. These serious flaws must be rectified.</p>	
<p>The strong emphasis on biodiversity net gain and green infrastructure is welcome and highly relevant to rural areas. However, the policies focus largely on designated sites and strategic initiatives, with less clarity on how everyday farmland, field margins and village greens contribute to nature recovery. There is limited reference to working landscapes, farm businesses or parish level stewardship. Stronger rural proofing would support farmer engagement, community led nature projects and management funding, ensuring biodiversity goals align with viable rural land use and benefit both wildlife and local residents.</p>	<p>203170 (Cambridgeshire ACRE)</p>
<p>What to amend of the policy:</p> <ul style="list-style-type: none"> • Promote the use of home-grown timber in construction to reduce embodied-carbon emissions, in line with the Government’s 25 Environment Plan and Net-Zero Strategy. • Add a new policy requiring all new developments to incorporate integrated swift bricks, bat boxes and hedgehog highways, with a target of at least one swift brick per unit on average, to be secured through planning conditions. • Highlight that the current emphasis on Biodiversity Net Gain metrics may overlook important species-specific features such as swift bricks and hedgehog highways and note that national guidance and other local plans already endorse such measures. 	<p>203219 (Forestry Commission), 203248, 203249, 203250, (Fulbourn Swifts Group),</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> Stress that these low-cost measures are an effective way to support priority and threatened urban species (swifts, bats, hedgehogs) and should be included in the Local Plan alongside BNG requirements. 	
<p>The environment must remain a top priority. Greater Cambridgeshire is home to a rich and varied range of wildlife, much of which is already under increasing pressure from ongoing development. Additional large-scale construction threatens to further reduce wildlife and damage fragile ecosystems. Small rural villages and the surrounding countryside must be safeguarded to protect their character and environmental value. Wherever possible, existing trees should be preserved and properly protected, as mature trees are essential to the landscape, wildlife habitats, and overall environmental wellbeing.</p>	203757 (G Chamberlain)
<p>Concerns were raised about insufficient protection for tree canopies over private property, as individuals are able to excessively trim or remove trees. The removal of a fully grown Walnut tree at Brooke side allotments has raised concerns about prioritising the tree's canopy over the interests of a few allotments.</p>	205614 (C Dunbar), 205615 (C Dunbar)
<p>Threat to the chalk streams:</p> <ul style="list-style-type: none"> The chalk aquifers are water-stressed and the development would further deplete groundwater, threatening rare chalk streams and the wider ecosystem. A development of 5,000-6,000 homes would dramatically increase water abstraction, risking reduced flows and seasonal drying of the Great Abington chalk stream. Construction and urban runoff from the scheme would degrade water quality and threaten the sensitive chalk stream species. Large areas of hard surfacing would alter natural groundwater recharge, increase flood risk and erosion, and SuDS cannot replicate natural chalk filtration at this scale. 	205768 (J Sneddon), 205805, 205806, 205807, 205808, 205809 (R Martin),

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> Cumulative impacts – including existing abstraction, climate change effects and inadequate assessment of mitigation – have not been properly evaluated, breaching the precautionary principle. 	
<p>Support and protection of green space and biodiversity:</p> <ul style="list-style-type: none"> We support the creation of about 80 ha of publicly accessible green space, including meadows, walking and cycling routes and parkland. We support the biodiversity enhancements, habitat restoration and green corridor creation proposed for the site. Productive farmland and valuable wildlife habitat would be lost without justification. Important wildlife habitats would be destroyed and no mitigation could reverse the loss. Nighttime pathway lighting would deter any reintroduction of wildlife. The development would destroy ancient elm woodland and associated species, causing irreversible loss of irreplaceable ecological The development would increase light and noise pollution, adversely affecting local wildlife and the rural environment. Provide details on the management of the remaining arable fields and open spaces outside the site allocation area. 	<p>205960, 205962, (Histon and Impington Community Land trust), 205988 205969, 205987 (R Randle), 206007 (M Goldberg), 206066 (A Marns), 206122 (Elsworth PC)</p>
<p>Rural active travel routes should be bridleway to include horseriders</p>	<p>203962 (S Rogers)</p>
<p>[In Great Wilbraham] Current biodiversity provision is inadequate – fields are intensively farmed, there are only four public rights of way, many are overgrown and not linked, limiting access to quality green space. We would like support to enhance local biodiversity and green-space access, maintain and connect footpaths, create circular routes and improve habitat quality.</p>	<p>206563,206564, 206566 (Great Wilbraham PC)</p>

Summary of issues raised in comments	Comments highlighting this issue
We would like to work informally with the Council and neighbouring parish councils to develop a joint sustainability strategy for our community.	
ECC welcomes that the Greater Cambridge councils are seeking to ensure that biodiversity and green spaces are addressed as a strategic priority. Seeking to increase and improve the network of habitats for wildlife, and green spaces “for people, ensuring that development leaves the natural environment better than it was before” (Page 23). ECC draws attention to the Essex Local Nature Recovery Strategy, and recommends that consideration be given to the strategy, with any cross boundary matters appropriately considered and addressed within the emerging Local Plan.	210462 (Essex County Council)
Support for the policy but lacks detail.	202497 (I Morris)
The ambition to double nature recovery is fully supported.	208001 (Cambridgeshire County Council)
The plan should create new rights of way across farmland and reserves to improve resident access to nature and active travel.	208002 (Cambridgeshire County Council)
New developments should provide multiple, green-linked entrances rather than a single car-focused access point.	208003 (Cambridgeshire County Council)
The five “dispersed” green-infrastructure initiatives lack detail; clarification is needed on delivery and on how environmentally-friendly farming will be promoted.	208004 (Cambridgeshire County Council)
We request that the mandatory net-biodiversity gain for major developments remain at the statutory 10 % rather than the draft’s 20% requirement.	208293 (Trinity College)

Summary of issues raised in comments	Comments highlighting this issue
<p>There is insufficient clarity that Rights of way improvements will deliver new bridleways, upgraded routes and safe crossings for equestrians, rather than primarily on pedestrian and cycle infrastructure.</p> <p>Policies relating to green infrastructure and connectivity should:</p> <ul style="list-style-type: none"> -Commit to creation of new bridleways/restricted byways and upgrading of footpaths to bridleways. restricted byways where appropriate. -Ensure that new bridges, underpasses, crossings are suitable for horses. -Prevent the loss/downgrading of existing equestrian access. 	208659 (British Horse Society)
<p>The 20 % biodiversity net gain requirement exceeds the statutory 10 % and lacks justification; a more realistic target is recommended.</p>	209041 (Marshall Group Properties)
<p>Consider:</p> <ul style="list-style-type: none"> • could be balanced with people’s interactions with green space • Gardens as extensions C11 of green spaces? • Play not specifically referenced • Effective engagement/groups that can look after and nurture green spaces • The link of specific activities park run, wild swimming, pump tracks how can these activities come together and harmonise with biodiversity • The City Council produced a report with Women in Sport which demonstrated that a third of young women in Cambridge did not feel safe in open spaces within the city. 76% reported a lack of toilet or appropriate changing facilities. There are clear issues with the ways these spaces are planned and designed that would 	210538 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
<p>be good to understand and reduce the barriers to young women accessing these spaces and engaging in sport or exercise.</p>	
<p>The Trust published its 10-year strategy “People and Nature thriving”. At its core are three ambitious 2050 goals to restore nature, end unequal access to nature, beauty and history, inspire millions more people to care and take action. The National Trust owns and manages the Wimpole Estate within the Greater Cambridge planning area. Along with Anglesey Abbey, Northfield Farm and Wicken Fen nearby in adjoining East Cambridge. Much of this land has been declared “inalienable”. This status enables the Trust to live up to its core charitable objective of preserving places of historic interest and beauty for the nation, forever. Growth within Greater Cambridge could impact each and all of these sites. But any adverse impacts could be managed with appropriate mitigation. Furthermore, with collaborative working, they could also offer potential opportunities to support growth through access to greenspace, nature and heritage.</p>	<p>211075 (The National Trust)</p>

Policy BG/BG: Biodiversity and geodiversity

Abbreviations

PC= Parish Council, DC= District Council, TC= Town Council, BNG=Biodiversity Net Gain, LNRS= Local Nature Recovery Strategy

Summary of Main Issues:

General support for the policy intent to protect and enhance biodiversity from a range of individuals, organisations and developers. Comments that the policy provides significant benefit for nature in Greater Cambridge and supports the Cambridgeshire Doubling Nature Vision. Comments noted that biodiversity enhancement should also address climate change adaptation, nature-based solutions, flood resilience, and improvements in health and wellbeing. Natural England noted their support for the policy but highlighted the need for further discussions to agree on a suitable approach to recreational pressure issues within Greater Cambridge.

Some organisations and individuals suggested that the policy should set, or go further than, a minimum of 20% BNG onsite for all development and not rely on the mandatory 10% improvement target (for example comment that the policy should require higher BNG in specific circumstances such as large sites, strategic allocations, and sensitive locations). Other comments expressed the view that limiting BNG to 10% on all but major sites contradicts the goal of doubling BNG within Cambridge.

Objections and concerns were also raised to the policy requirement for 'major' development to deliver 20% BNG. Comments expressed the view that the target was unsound, lacking adequate justification and was inconsistent with national policy and guidance. Comments from developers and University of Cambridge Colleges suggested that any BNG above the mandatory 10% should be considered a material benefit in planning decisions, rather than a strict policy requirement.

Comments expressed the view that the policy lacks appropriate evidence and needs to further consider viability, deliverability and flexibility to avoid restricting opportunities for density uplift and to achieve the housing numbers set out under the draft site allocations listed in S/LAC. The Home Builders Federation commented that the policy does not sufficiently evidence the local need for new development to deliver beyond 10% BNG, other comments considered that a blanket 20% BNG is disproportionate for small and medium-sized sites. The University of Cambridge, other organisations and developers commented that for the policy to be in alignment with the NPPF that further justification should be provided for specific sites where 20% is feasible and viable.

Comments from various organisations and individuals were received suggesting that certain development should be exempt from the requirement for 20% BNG (health and public service infrastructure and essential major infrastructure projects), suggesting alignment with statutory 10% BNG instead. Comments from developers supported the policy recognition that on-site delivery of BNG may not always be feasible and appreciated the flexibility to deliver off-site provision where it cannot be provided on site (in line with Planning Practice Guidance, paragraph:001 Reference ID:74-001-20240214 Biodiversity Net Gain). The University of Cambridge suggested that the policy should include qualification that off-site provision is acceptable as there will be fewer and fewer instances where on-site can be achieved at the higher level and, an individual comment suggested that policy should focus offsite enhancements within the GCP area. However, other comments were received which opposed to the use of off-site biodiversity net gain in principle (citing no basis in the NPPF establishing the acceptability of off-site biodiversity net gain). A Resident Association expressed the view that if smaller sites cannot deliver meaningful BNG then the answer should not be offsite BNG, but refusal of development given the wider harm.

Comments were raised critiquing the use of the Doubling Nature report as an evidence base. Comments were raised about the monitoring and enforcement of Biodiversity Net Gain and the arrangements for this.

Further responses suggested that the policy should require BNG to contribute toward ecological connectivity (for example the creation and enhancement of ecological networks as set out in the Cambridge and Peterborough LNRS) and, the Environment Agency suggested that the Plan should require developers to submit a funded HMMP for every habitat creation or enhancement measure.

The National Trust recommended that the policy should include specific wording requiring proposals within the Zone of Influence of designated Habitats sites to provide alternative natural greenspace to alleviate visitor pressure on those sites.

Response to the main issues raised in representations

Support for the broad policy approach is noted.

Regarding representations that proposed that 10% BNG should be a minimum expectation and that policy should require higher BNG in specific circumstances such as large sites, strategic allocations, and sensitive locations, and those objecting to only requiring 10% BNG on minor development, the Councils have not changed the policy approach. Requiring higher than 20% is not considered to be achievable on many sites. Requiring 20% BNG for any development which is not major is often not deliverable or viable for smaller sites to deliver 10% BNG onsite.

In response to concerns about the policy exceeding 10% national mandatory BNG specifically citing the draft NPPF (which sets out that LPAs should not be going above 10% BNG), the Councils have not made any changes to the Plan to respond to comments recommending alignment with the consultation on revised National Planning Policy Framework (NPPF) and other changes to the planning system held between December 2025 and March 2026. National Planning Practice Guidance on BNG sets out that plan-makers may seek a higher percentage than the statutory objective of 10% BNG either on an area-wide basis or for specific

allocations for development unless justified, and where this is supported by local evidence, including local need, local opportunities; and impacts on viability for development. In the Biodiversity and Green Spaces Topic Paper the Councils have provided robust justification for the policy approach for 20% BNG for major development and 10% for minor development in Greater Cambridge, through evidence, analysis of local data and reasoned justification of the implementation of the policy in practice. Low levels of protected areas, priority habitats, open access land and accessible natural greenspaces means there is a greater need to repair that loss and restore biodiversity across the area, where possible, through the planning and development. 20% biodiversity net gain for major development would also better support the Councils' ambition to restore biodiversity and double nature than a lower percentage requirement. No Change to policy approach.

The Greater Cambridge Draft Local Plan Viability Assessment (2026) demonstrates that the draft policy is viable and hence deliverable. The Biodiversity & Green Spaces Topic Paper identifies a wide range of sites in Greater Cambridge delivering or aiming to deliver 20% BNG, demonstrating that there are opportunities already delivering this level of net gain.

In response to comments received regarding the policy's approach to off-site provision of biodiversity, BNG can be achieved on-site, off-site or through a combination of both measures. The policy retains flexibility in order to allow off-site provision where it cannot be provided on site (in line with Planning Practice Guidance, paragraph:001 Reference ID:74-001-20240214 Biodiversity Net Gain) and sets out that the Councils will seek to achieved BNG on-site wherever this is feasible and effective, and only secure BNG off-site when on-site options have been exhausted. Additional wording has been added to the policy to provide clarity that off-site provision can used where on-site options for BNG have been evidenced to be exhausted as agreed with the Local Planning Authority (LPA) (and where it is not feasible and effective to be provided on site). The policy sets out that the Councils' preference is for BNG to be delivered on-site wherever

possible, before exploring off-site options, ensuring developments make the most effective contributions to local biodiversity which prioritise gains within the vicinity of the development site. This approach aligns with Policy S&GS 10 of the Stapleford and Great Shelford Neighbourhood Plan which states, 'Where off-site BNG is necessary, opportunities for delivery within the neighbourhood area should be considered before looking at opportunities elsewhere.'

In response to comments on the protections in the policy for changes to existing or new Local sites not captured on the policy map, the supporting text sets out that other undesignated green spaces also make up the ecological network of sites across the city and would be subject to this policy, if they are identified as meeting the criteria for city or county wildlife site Local Site status following the County Wildlife Sites System.

In response to comments suggesting that the policy should require BNG to contribute toward ecological connectivity (for example the creation and enhancement of ecological networks as set out in the Cambridge and Peterborough LNRS), the policy and supporting text have been amended to include additional reference to the LNRS. Policy BG/GI already requires development to ensure that on-site green infrastructure is connected. Responding to the suggestion to require developers to submit a funded HMMP for every habitat creation or enhancement measure, this change has not been made as HMMPs are designed to specifically support BNG (which requires all on-site significant enhancements and all offsite BNG provision to be legally secured for a minimum 30-year duration, subject to a Biodiversity Gain Plan; and an HMMP outlines how this retained, created or enhanced habitats (as part of an approved development) will be maintained and monitored for 30 years). It is anticipated that a GI Plan would cover the necessary requirements for green infrastructure.

Responding to concerns about the use of the Doubling Nature Report as evidence for Biodiversity Net Gain, further explanation of the rationale and justification for Policy BG/BG has been set out in the topic paper.

Responding to concerns about the monitoring and enforcement of Biodiversity Net Gain, the Councils are required to produce the Biodiversity Duty report which summarises what BNG has been secured and delivered. BNG is secured through legal agreement to ensure that is delivered. There is also a monitoring indicator for Biodiversity Net Gain 10% and 20% in Appendix F The Monitoring Framework to ensure this is properly monitored.

The Councils have considered the recommendation to require proposals within the Zone of Influence of designated Habitats sites to provide alternative natural greenspace to alleviate visitor pressure on those sites. Engagement with Natural England confirmed that there is not a clear case for including policy within the Plan seeking to specifically mitigate recreational impacts on European sites, noting that the Eversden and Wimpole Woods SAC itself is not currently significantly impacted by recreational impacts, and that there is not currently a strategic recreational mitigation project associated with Wicken Fen SAC and Ramsar site. However, drawing on the same engagement, the policy has been amended to require development to mitigate recreational impacts on SSSIs within Greater Cambridge, to be achieved through the design, location and early-phase delivery of on or offsite Accessible Greenspace provision.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Suggestion that policy should set minimum 20% Biodiversity Net Gain (BNG) onsite for all development, and not rely on mandatory 10% improvement target. Limiting BNG to 10% on all but	201457 (C Todd), 201478 (H Brown), 206766 (Endurance Estates)

Summary of issues raised in comments	Comments highlighting this issue
<p>major sites contradicts the goal of doubling BNG within Cambridge (a disconnect between policy and aspiration).</p>	
<p>Support for the policy.</p> <ul style="list-style-type: none"> • Specifically, Natural England comment welcomes the policy but note need for further discussions about part 9 of the policy to agree on a suitable approach to the recreational pressure issue. • National Trust comment that proposed new development must follow the Mitigation Hierarchy and provide appropriate mitigation for recreational impacts on designated sites, including the provision of SANGs, in accordance with Natural England's guidance and advice 	<p>202808 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 202921 (Cambridge Liberal Democrat Group), 204636 (M Cleminson), 207621 (Natural England), 208452 (National Trust), 210578 (Cambridgeshire County Council)</p>
<p>Support the requirement to secure 20% BNG as part of major developments.</p> <p>Concerned that protection in part 7 is solely focused on existing sites of biodiversity or geological importance, as identified on the policies map. This will result in any proceeding changes to existing or new Local Sites not captured on the policies map, will not be afforded the same protection. We seek that this section of the policy be expanded to include impact on all land (designated or not) supporting habitats/species that meet City Wildlife Site or County Wildlife Site criteria. We would also</p>	<p>210558 (Cambridgeshire County Council)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>suggest that the policy map in 'live' and measures are put in place to update it on an annual basis, following release of the updated Local Sites GIS layers from CPERC.</p>	
<p>Policy should set higher targets and go further than 20% BNG for major development.</p>	<p>204636 (M Cleminson), 205226 (E Green)</p>
<p>We request that the Council considers the impact of 20% BNG for all major development types, and the impacts this requirement would have on the timely delivery of essential infrastructure to support the Council's growth ambitions. We suggest that essential major infrastructure projects, where there is no scope for BNG onsite should be exempt from the 20% BNG requirement for major development</p>	<p>210204 (Anglian Water Services)</p>
<p>Policy should clarify that 10% Biodiversity Net Gain (BNG) is a minimum expectation, not the desired outcome, and should require higher BNG in specific circumstances such as large sites, strategic allocations, and sensitive locations.</p>	<p>204915 (Mothers CAN Cambridge)</p>
<p>General support for policy intent/overall objective of policy to protect and enhance biodiversity.</p> <p>Specific comments that:</p> <ul style="list-style-type: none"> • The policy provides significant benefit for nature in Greater Cambridge • The policy supports the Cambridgeshire Doubling Nature Vision • Biodiversity enhancement should also address climate change adaptation, nature-based solutions, flood resilience, and improvements in health and wellbeing. 	<p>201475 (S Smalley), 201514 (RSPB), 202025 (R Pargeter, 203194 (Cambridge Past, Present and Future), 203682 (Cambridge Green Party), 203953 (DP9 Ltd on behalf of Trinity College Cambridge-</p>

Summary of issues raised in comments	Comments highlighting this issue
	131441), 204535 (Max Fordham), 204541 (NP Architects), 204560 (Carter Jonas on behalf of Redrow South Midlands), 205111 (NHS Property Services Ltd on behalf of NHS Cambridgeshire and Peterborough Integrated Care Board-131454), 205250 (Home Builders Federation), 205596 (Mothers CAN Cambridge)
Support that the policy requires major developments to provide minimum 20% BNG	201475 (S Smalley), 201514 (RSPB), 202025 (R Pargeter, 203194 (Cambridge Past, Present and Future),
Broadly support for policy. However, clause 6 – it is important for the LPA to question the basis on which baseline biodiversity is measured for every prospective development. We have seen developers reduce the biodiversity of prospective sites prior to submitting a planning application as a means of reducing their future BNG commitment, such as at Green Belt land behind Mingle Lane in	210925, 210926 (Great Shelford Parish Council)

Summary of issues raised in comments	Comments highlighting this issue
Great Shelford/Stapleford. Clause 6 should take the biodiversity of field margins into consideration, whether managed specifically for nature or not.	
<p>Comments received which support the policy intent but which suggested specific amendments to the policy requirements for 20% BNG for major development:</p> <ul style="list-style-type: none"> • CPPF note that 20% BNG policy for major development is inconsistent with government legislation unless it is site specific and robustly justified, it is therefore recommend that the first 10% of BNG follows strict rules, while the remaining 10% allows for more flexible habitat replacement to maintain a high overall gain while providing the flexibility to make it more deliverable, especially on-site, and therefore more cost effectively for developers. • CIP consider that policies Policy BG/TC, BG/GI, Policy BG/EO, Policy WS/NC, Policy H/SS in conjunction restrict opportunities for density uplift and achieving the housing numbers set out under the draft site allocations listed in S/LAC. Suggest that the policy needs to better align with other draft GCLP policies and housing requirements, in order to feasibly achieve a 20% BNG uplift. • NP Architects consider a blanket 20% BNG is disproportionate for small and medium-sized sites and suggest scaled approach with exemptions for sites under 0.2 hectares, 10% net gain for sites between 0.2 and 1 hectare in line with national policy, and 20% reserved for sites over 1 hectare, maintaining biodiversity outcomes while supporting site viability. • NHS Cambridgeshire and Peterborough Integrated Care Board requests policy wording to exempt health and public service infrastructure from the enhanced BNG requirement, suggesting alignment with statutory BNG requirements instead 	<p>203194 (Cambridge Past, Present and Future), 204325 (Carter Jonas on behalf of Cambridge Investment Partnership-131440). 204541 (NP Architects), 205111 (NHS Property Services Ltd on behalf of NHS Cambridgeshire and Peterborough Integrated Care Board-131454)</p>

Summary of issues raised in comments	Comments highlighting this issue
General support for principle of policy for 20% BNG but for policy to be in alignment with NPPF further justification should be provided for specific sites where 20% is feasible and viable. It is necessary to see the technical consultant analysis of the evidence base to justify the increase.	202474 (University of Cambridge)
Suggestion that policy should explicitly state that 10% BNG is a minimum expectation, not the desired outcome, and require higher BNG in defined circumstances (large sites, strategic allocations, sensitive locations)	204535 (Max Fordham)
Suggestion that policy should require BNG to contribute toward ecological connectivity i.e. creation and enhancement of ecological networks including river corridors and habitat stepping stones as set out in the Cambridgeshire Nature Recovery Strategy.	204535 (Max Fordham) 205595 (Mothers CAN Cambridge)
Supports that policy recognises that on-site delivery of BNG may not always be feasible and appreciates the flexibility to deliver off-site through registered habitat banks or statutory biodiversity credits.	204849 (Vistry Group)
We support a higher level of biodiversity gain for new development than the current national requirement.	203262 (Horseheath PC)
Opposed to the use of off-site biodiversity net gain in principle- there is no basis in the National Planning Policy Framework establishing the acceptability of off-site biodiversity net gain	203682 (Cambridge Green Party)
Comment that if smaller sites cannot deliver meaningful BNG, then the answer isn't offsite BNG credits/planting, it is refusal of development given the wider harm to local environment, street scene, residential amenity, increase in urban heat, and so on	205490 (North Newtown Residents Association)

Summary of issues raised in comments	Comments highlighting this issue
<p>It is notable that many development proposals have proposed net gains but fail to deliver them or are later found to have been passed off to third parties. Effective enforcement is critical to success.</p>	<p>205205 (D Stoughton)</p>
<p>Comment that whilst it is important for development to ensure that it improves the natural environment it is important to also recognise residential development is not a significant driver of biodiversity decline in Greater Cambridge (the main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023 as being “Intensive management of agricultural land), and, that the lack of national or internationally important protected areas or low percentages of open access land and accessible open green space, as outlined in paragraph 3.25 of the topic paper does not indicate that there is a local need for new development to deliver beyond the 10% required by statute.</p>	<p>205250 (Home Builders Federation)</p>
<p>Note that policy continues to require development to achieve a minimum 20% biodiversity net gain, which exceeds the mandatory requirement set out in the Environment Act 2021. A fixed requirement of 20% clearly represents a strong aspiration and it will be important to understand its overall viability implications particularly when considered alongside the cumulative impact of other plan policies. It is therefore important this requirement is considered on a site-specific basis and assessed alongside the cumulative impact of other plan policies as site capacity and viability work progresses.</p>	<p>210234 (Turley on behalf of Vistry Group)</p>
<p>Comments received about the evidence base upon which the draft plan Viability Assessment (2025) considers that the 20% threshold is viable:</p> <ul style="list-style-type: none"> that where offsite delivery is required, it will mean costs increase due to the spatial risk multiplier which does not appear to have been considered in the Viability Assessment (with 	<p>205250 (Home Builders Federation), 208909 (Nightingale Land on behalf of</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>the consideration of costs relying on research undertaken to inform plan making in Essex, which relies heavily on the DEFRA impact assessment which significantly underestimates the cost of offsite credits and takes no account of the spatial risk multiplier) and,</p> <ul style="list-style-type: none"> • that the evidence supporting the 20% threshold is based upon the DEFRA 'Impact Assessment Biodiversity Net Gain and Local Nature Recovery Strategies No. RPC Reference No: RPC-4277(1)-DEFRA0EA and SQW report 'Viability Assessment of Biodiversity Net Gain in Essex' (August 2024) and that in this regard, the market in Essex is invariably different to Greater Cambridge and it is unclear what effects setting a 20% threshold will have on development viability in the local area 	<p>Nightingale Land and Hill Residential Ltd-132041)</p>
<p>Comment that whilst encouraging development to deliver offsite gains within the borough or area identified in the LNRS is not inconsistent with national it is unnecessary as the spatial risk multiplier already provides such an incentive. Suggestion that given there is a financial incentive to achieve this aim there is no need for this to be stated in planning policy.</p>	<p>205250 (Home Builders Federation)</p>
<p>Objections and concerns raised to policy requirement for 'major' development to deliver 20% BNG. Comments consider that the policy is unsound, lacking adequate justification and inconsistent with national policy and guidance (PPG Paragraph: 006 Reference ID: 74-006-20240214/ Paragraph 2 of Policy N1 of the draft new NPPF.</p> <ul style="list-style-type: none"> • Lanpro submit comment that policy does not account for site specific conditions and suggest reducing base BNG to 10%, with higher percentages only for specific sites. • Stantec submit a concern that increases will have significant impacts upon layout and viability, with the potential to prevent suitable sites coming forwards. Given the spatial 	<p>201675 (Stantec on behalf of British Land), 202339 (Lanpro Services on behalf of Granta Land Ltd-Land at Valley Farm, Meldreth-130982), 202545 (Lanpro Services on behalf of Granta Land Ltd-Land West of Station Road, Meldreth-</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>strategy is fully reliant upon major developments, the risk of delay or failure of some sites to contribute to delivery is high. Suggestion that 20% requirement deleted or only added to policies supporting relevant allocations.</p> <ul style="list-style-type: none"> • Bidwells submit objection on the basis that policy could undermine policy certainty by imposing a fixed uplift without adequate justification, suggesting that any BNG above 10% should be treated as a material benefit in planning decisions. Any local BNG requirement exceeding the statutory minimum must be justified, flexible, and based on site-specific ecological capacity and viability • Chaplin Farrant Ltd submit objection and comment that the policy lacks appropriate evidence and does not consider its implications for site delivery, particularly regarding the availability and cost of off-site credits. Suggestion that the Council should conduct a strategic assessment to evaluate the viability impacts of increasing BNG from 10% to 20%, focusing on specific sites rather than applying a blanket approach. If 20% is to be sought this should relate to specific sites with detailed justification for an enhanced BNG requirement. • Carter Jonas (203356) submit objection to the policy on the basis that it goes significantly beyond mandatory BNG requirement. Suggest policy should be revised to: • Align the Local Plan with the statutory 10% BNG requirement, unless robust, site specific justification is provided for a higher uplift and whole plan viability testing has been completed. <ul style="list-style-type: none"> 2. Recognise the role of life science campuses in delivering strategic, site wide biodiversity enhancements, allowing BNG to be delivered across the wider estate rather than at plot level. 3. Enable site wide habitat creation to generate and “bank” BNG credits, which can be used to support and mitigate future phases of development within science parks and speed 	<p>131266), 202658 (Lanpro Services on behalf of Granta Land Ltd-Land at Sheene Farm, Meldreth-131267), 202672 (Lanpro Services on behalf of Granta Land Ltd-Land East of Station Road, Meldreth-131268), 202791 (Martin Grant Land Ltd), 203065 (Bidwells on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners-131395), 203192 (Chaplin Farrant Ltd on behalf of ESCO Prospect-131457), 203356 (Carter Jonas on behalf of BMR Granta Park PROPCO Ltd- 131447), 203953 (DP9 Ltd on behalf of</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>up delivery.</p> <p>4. Ensure that BNG policy does not unintentionally constrain the delivery of essential life science floorspace, acknowledging the operational and spatial demands of R&D buildings.</p> <ul style="list-style-type: none"> • Redrow South Midlands object to 20% BNG requirement raising concerns about soundness of policy, viability concerns and the cumulative burden of various draft policies which could reduce developable area and limit housing delivery, particularly affecting urban or brownfield sites. It is suggested that the policy should acknowledge the need to balance BNG delivery with wider plan objectives, housing capacity expectations, and whole plan viability. • Abbey Properties Cambridgeshire Ltd, Bellway Strategic Land, PX Land Ltd and Redrow South Midlands suggest policy should be revised to align with the statutory 10% requirement. • Vistry objects on the basis that the existing national requirement for a minimum 10% Biodiversity Net Gain (BNG) is sufficient for ecological enhancement. Also, suggestion that the viability implications of all plan requirements should be considered collectively if this policy is to be pursued. • Hill suggest a proportionate approach, adopting the 10% national baseline with an aspirational target of 20%, considering site viability and other policy factors. The respondent warns that additional costs from exceeding the 10% threshold could impact development viability and, that the interaction of various draft policies may restrict density uplift and housing delivery, affecting the viability of sites for affordable housing and infrastructure. • Pegasus Group comment that delivering 20% BNG onsite would inevitably require more land, reducing the developable area of major sites and reducing their gross development value. Similarly, a higher degree of offsite mitigation would be required in order to deliver a 	<p>Trinity College Cambridge-131441), 204117 (Bidwells LLP on behalf of E W Pepper Ltd-131461), 204137 (Bidwells- on behalf of Emmanuel College (Long Road)-131435), 204263 (Bidwells on behalf of Bellway Strategic Land-131588), 204313 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204374 (Bidwells on behalf of Tritax Big Box Developments -131432), 204494 (Bidwells on behalf of Bellway Strategic Land-131458), 204560 (Carter Jonas on behalf of Redrow South Midlands),204573 (Carter</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>20% net gain, which would mean a higher cost to the developer. It is suggested that part 2 of the policy is deleted as the policy risks creating uncertainty about how major developments could comply with it. This is because any policy that adds uncertainty to the determination of planning applications risk delays and unnecessary costs for developers and Councils, and is therefore not fully justified and deliverable.</p> <ul style="list-style-type: none"> • Endurance Estates object to the policy stating that the requirements are overly burdensome and lack justification, positive preparation, and consistency with National Policy. The policy should reflect National and Legislative requirements, whilst encouraging additional gains on a site-by-site basis where feasible. • HBF could not see any justification in the plan or evidence base as to why development in Greater Cambridge should be delivering more than the 10% statutory requirements. Commenting that if the 20% requirement is considered to be sound it will be necessary for soundness that flexibility is included in the local plan with regard to the percentage of net gain required above the statutory minimum. The policy should clearly state that where this is impacting the viability and deliverability of a development that any BNG requirement will be reduced to the 10% statutory minimum. • Axis Land Partnerships suggest that higher percentages should only apply to specifically justified specific sites. • Gladman Developments object noting that 20% is only requested where it is ‘feasible and effective.’ However, given that the request is 10% higher than what is required by national policy, inevitably the majority of the development industry will be seeking exemptions with the primary focus being the viability of a scheme. Such an exercise is unnecessary and overly onerous to result in a requirement that is already set nationally. • T Elbourn (Sworders) consider there is no justification for a requirement of 20% BNG for major development, particularly when taking into account the additional requirements of 	<p>Jonas on behalf of Redrow South Midlands), 204679 (Carter Jonas on behalf of Jaynic-131675), 204740 (Optimis Consulting Ltd on behalf of Croudace Homes-131687), 204749 (Abbey Properties Cambridgeshire Ltd), 204752 (Bidwells LLP on behalf of Vistry-131453), 204800 (Carter Jonas on behalf of Hill), 204829 (Carter Jonas on behalf of Jaynic), 204849 (Vistry Group), 205001 (Pegasus Group on behalf of Martin Grant Land), 205060 (Savills on behalf of Endurance Estates), 205250 (Home Builders Federation), 206221</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>policies BG/GI, BG/TC and BG/RC which also contain significant biodiversity and landscaping requirements. These policies have the potential to affect the developable area of sites, particularly smaller ones, and we question whether required densities can be met on such sites.</p> <ul style="list-style-type: none"> Urban and Civic object to a universal requirement for all development to provide a minimum of 20% biodiversity net gain, unless exempt under the Environment Act 2021. As drafted the policy is inconsistent with UK Government legislation (which requires a minimum of 10%) and introduces a blanket constraint that may well frustrate necessary development. Particularly in circumstances when standalone applications are brought forward as a component part or to support wider proposals this is likely to have unintended consequences. The policy should be amended to refer to a 'target of 20% biodiversity net gain' rather than a 'minimum' and to acknowledge circumstances when exceeding nationally set requirements may not be appropriate. 	<p>(Lanpro Services on behalf of Granta Land Ltd, land at Valley Farm Meldreth-130982), 207443 (Bidwells- on behalf of Pioneer Group Ltd-131935), 208324 (Lanpro Services on behalf of PX Land Ltd-131922), 208784 (Lanpro Services on behalf of Axis Land Partnerships Ltd-131763), 208333 (Gladman Developments), 208353 (Sworders on behalf of Elbourn), 209208 (Urban & Civic)</p>
<p>Policy should be amended to require all development to deliver BNG providing a minimum of 10% BNG against the baseline, unless exempt under the Environment Act 2021, to be provided on-site in line with guidance.</p>	<p>201675 (Stantec on behalf of British Land), 203933 (Bidwells on behalf of Emmanuel College (Wilberforce Road)-131570)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The policy requirement of 20% Biodiversity Net Gain is not consistent with the National Requirements for BNG.</p>	<p>209701 (Lanpro Services on behalf of B Homent, J Tee and R Smith), 211237 (Living Space Housing), 211283 (Woolsington One Ltd)</p>
<p>The uplift of the minimum BNG requirement unfairly penalises SME developers who deliver smaller residential developments that cannot often feasibly deliver the mandatory 10% net gain in biodiversity, in full, onsite. LSH suggest that Policy BG/BG needs to be amended to be consistent with the national requirements for delivering a net gain in biodiversity, to be justified.</p>	<p>211237 (Living Space Housing)</p>
<p>The Councils should note that the Government's Planning Practice Guidance (reference ID: 74-006-20240214) discourages the seeking of more than 10% biodiversity net gain. Therefore, the reference to 20% being actively encouraged should be removed.</p>	<p>209701 (Lanpro Services on behalf of B Homent, J Tee and R Smith)</p>
<p>Draft policy requirement for major development is double the mandatory requirement of 10%. This increase in BNG is a significant additional cost which can impact viability and can compromise designs. Requested that the Councils consider the policy requirement remain at the mandatory threshold of 10%.</p> <p>Girton college, in addition, note that inevitably there will always be sites where increased gains can be delivered. The site-specific circumstances can make a considerable difference to the ability to</p>	<p>208280 (Turley on behalf of Imperial War Musuem), 208302 (Turley on behalf of Girton College), 2111405 (Persimmon Homes East Midlands),</p>

Summary of issues raised in comments	Comments highlighting this issue
include for the creation of on-site habitats and BNG delivery. Also note that the viability challenge has been recognised by central government.	
Clarity is needed on point 1 of the policy which as written implies all BNG must be on site. The biodiversity net gain policy should retain flexibility in order to allow off-site provision where it cannot be provided on site (in line with Planning Practice Guidance, paragraph:001 Reference ID:74-001-20240214 Biodiversity Net Gain)	202791 (Stantec), 2111418 (Lanpro Services on behalf of CALA Group Ltd)
Support the policy's recognition that on-site delivery of biodiversity net gain may not always be achievable. Paragraph 3 of the policy appropriately states that, where on-site options have been exhausted to the satisfaction of the Local Planning Authority, biodiversity net gain may be delivered off-site through registered habitat banks, bespoke schemes or statutory biodiversity credits. This flexible approach is welcomed, as it reflects the overarching objective of biodiversity net gain, which is to leave the natural environment in a measurably better condition than before development takes place.	210235 (Turley on behalf of Vistry Group)
While the policy states that the Local Planning Authority "will encourage delivery of replacement habitat" within Local Nature Recovery Strategy priority areas, it is important to recognise that the availability of suitable credits within the Plan area cannot be guaranteed. In circumstances where sufficient local credits are not available, applicants should retain the ability to secure biodiversity net gain through alternative registered schemes elsewhere, in order to ensure that development is not unnecessarily constrained	210236 (Turley on behalf of Vistry Group)

Summary of issues raised in comments	Comments highlighting this issue
<p>Policy should focus on offsite enhancements within the GCP area, as opposed to prioritising onsite BNG which may deliver isolated fragments. Offsite should be favoured where it enhances green belt land (such as those on the southern perimeter of the city on the southern Gog Magogs) or where it adds to adjacent habitats increasing the landscape scale connectivity and/or contributes to specific habitat or species priorities. Changing policy BG/BG to prioritise off-site biodiversity offsets could be used to actively enhance the priority sites identified as GI opportunities in BG/GI policy supporting documents.</p> <p>Suggestion that for development proposed close to a site designated as a Strategic Green Initiative for countryside/habitat enhancement, the normal precedence to prefer on-site offsetting should be waived and offsetting credits offsite on the nearby strategic habitat should be given equal or higher credit.</p>	<p>201167 (M Foote), 201208 (M Foote), 203118 (M Foote)</p>
<p>We note the rightful inclusion of the Gog Magog Hills and chalkland fringe in the list of identified priorities for enhancing strategic green infrastructure. However, the Gog Magog Hills will be negatively impacted by CSET. the lengthy section of the busway from where it crosses the track to the east of Stapleford Granary and continues in a north-westerly direction to where it passes Nine Wells Local Nature Reserve near Cambridge South Station will use the lower slopes of the Gog Magog Hills. This inconsistency could be at least partly mitigated if an alternative, on-road route along the A1307 corridor from the A11 to the Cambridge Biomedical Campus was pursued instead.</p>	<p>209026 (Hobson's Conduit Trust)</p>

Summary of issues raised in comments	Comments highlighting this issue
Suggestion that BNG target for any developments allowed within the Green Belt are increased from the normal 20% to the 234% BNG precedent set by Strawberry Fields	203118 (M Foote)
Policy should include qualification that off-site provision is acceptable as there will be fewer and fewer instances where on-site can be achieved at the higher level.	202474 (University of Cambridge)
Any BNG above the mandatory 10% should be considered a material benefit in planning decisions, rather than a strict policy requirement.	203933 (Bidwells on behalf of Emmanuel College (Wilberforce Road)-131570), 204137 (Bidwells on behalf of Emmanuel College (Long Road)-131435), 204263 (Bidwells on behalf of Bellway Strategic Land-131588), 204374 (Bidwells on behalf of Tritax Big Box Developments - 131432), 204494 (Bidwells on behalf of Bellway Strategic Land-131458), 204752 (Bidwells LLP on behalf of Vistry-131453)

Summary of issues raised in comments	Comments highlighting this issue
<p>The additional requirement for major development to provide a minimum of 20% should only be an aspirational target (where sites can reasonably accommodate this)</p>	<p>203953 (DP9 Ltd on behalf of Trinity College Cambridge-131441), 204117 (Bidwells LLP on behalf of E W Pepper Ltd-131461), 204313 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204800 (Carter Jonas on behalf of Hill)</p>
<p>Unclear how LPA is to generally improve biodiversity (as GI plan is predicated on response to planning applications only). Suggestion for LPA to make an 'inventory of parish-owned land and the measures parishes are taking to improve biodiversity'.</p>	<p>201458 (T Stone)</p>
<p>Comment relating to policy sub paragraph 6: Policy should not limit the surveying on the basis of the supposed severity of impacts. This is because the severity of impacts can only be understood once survey undertaken. Additionally, this approach places decision making in hands of developers means undermining the information before decision maker to decide extent of impacts.</p>	<p>201476 (H Brown)</p>
<p>Comments received on policy approach to Suitable Alternative Natural Greenspaces (SANGs):</p> <ul style="list-style-type: none"> ➤ RSPB- Appreciation for requirement for SANGs to mitigate recreational disturbance, but believes the current wording lacks clarity regarding the strict tests imposed by the Habitats regulations for developments affecting European Sites- which in the Greater Cambridge 	<p>201514 (RSPB)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>context means the Eversden and Wimpole Woods SAC, but also potentially other sites outside the planning authority's boundaries such as Portholme SAC and the Ouse Washes SPA/SAC). Suggestion that as these tests are at a significantly higher level than would be applied to nationally or locally designated sites that this is made clearer in policy text and supporting information.</p>	
<p>Support for inclusion and application of the mitigation hierarchy in the policy.</p>	<p>201514 (RSPB), 203194 (Cambridge Past, Present and Future)</p>
<p>Support for inclusion of reference to geodiversity and sites of geological importance such as Local Geological Sites in policy</p>	<p>203461 (Cambridgeshire Geological Society)</p>
<p>Comment that Neighbourhood plans that identify suitable off-site locations for BNG within the neighbourhood area should take precedence over biodiversity credits or schemes registered with Defra to prevent net biodiversity depletion in the wider neighbourhood area.</p>	<p>201568 (Stapleford PC- Chair of the Stapleford and Great Shelford Neighbourhood Plan Steering Group)</p>
<p>Concern that LPA need to critically assess the baseline biodiversity measurements for developments, due to potential for developers to intentionally reduce site biodiversity prior to applications to lower subsequent BNG commitments.</p>	<p>201568 (Stapleford PC-Chair of the Stapleford and Great Shelford Neighbourhood Plan Steering Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
Field margins should be considered as part of biodiversity considerations regardless of whether they are being actively managed for nature, to ensure comprehensive assessment and protection of biodiversity.	201568 (Stapleford PC-Chair of the Stapleford and Great Shelford Neighbourhood Plan Steering Group)
BNG cannot always compensate for loss of habitat or harm to specific species, when offsite BNG is permitted in should be directly related to the nature of the loss.	202025 (R Pargeter)
The allowance “Exceptions will only be made where the benefits of the development significantly outweigh any adverse impacts” (paragraph 7) must permit solar ‘farm’ developers to dodge their wider responsibilities to the environment by invoking the climate emergency.	202025 (R Pargeter)
Parish Council request for policy to include connected corridor mapping through Girton, protect Washpit Brook and Beck Brook within biodiversity policy text and to embed Girton Gap as a strategic biodiversity and settlement separation asset.	202218 (Girton PC)
<p>Policy should be added to require wildlife enhancing features in all new development/ all new housing development, including:</p> <ul style="list-style-type: none"> • Provision at least one ‘swift brick’ per building. • Green roofs, hedgehog highways and birdboxes 	202442 (R MacDonald), 202500 (H Brown)
Policy should stipulate that all new gardens should be wildlife friendly, with hedgehog corridors in fencing, flowers and plants to support bees and butterflies, "bug hotels", bird boxes, etc.	202442 (R MacDonald)

Summary of issues raised in comments	Comments highlighting this issue
Policy should encourage the provision of Green Infrastructure to enhance biodiversity beyond BNG requirements, highlight the additional benefits of biodiversity (including urban cooling, runoff reduction, carbon capture, and public health) and the plan should explicitly acknowledge of the relationship between aquatic biodiversity and water availability in planning.	203194 (Cambridge Past, Present and Future)
Policy lacks specificity on how BNG will be secured, managed, monitored and enforced over time. There is no basis in the National Planning Policy Framework establishing the acceptability of off-site biodiversity net gain, and we remain opposed to the use of off-site biodiversity net gain in principle. Concern that city and county wildlife sites are not adequately protected from the adverse consequences of development under the provisions of this policy and recommend that the language of policy be improved to address this issue.	203682 (Cambridge Green Party)
Policy is not clear how development which is likely have adverse impact on water supply and biodiversity can be mitigated/offset.	204731 (Federation of Cambridge Residents' Associations)
We object to raising mandatory Biodiversity Net Gain to 20 % and a fixed greening factor of 0.4, and to a mandatory 30 % tree-canopy threshold and compulsory Building with Nature accreditation.	206524 (Barret David Wilson Homes and the North West Cambridge consortium of landowners)
1) Increase the Biodiversity Net Gain target for Green Belt developments from the standard 20 % to the 234 % level demonstrated at Strawberry Fields	203118 (M Foote)

Summary of issues raised in comments	Comments highlighting this issue
<p>2) favour BNG offsite over onsite for any development if it</p> <p>a) enhances green belt land or</p> <p>b) adds to adjacent habitats increasing the landscape scale connectivity and/or contributes to specific habitat or species priorities</p>	
<p>Request clarification of the 0.4 greening factor, assurance it does not double-count with BNG, permission for biosolar roofs in the factor calculation and that Building with Nature accreditation be optional.</p>	<p>203065 (Bidwells on behalf of Barrett David Wilson Homes and the North West Cambridge consortium of landowners)</p>
<p>Rural active travel routes should be bridleway to include equestrians.</p>	<p>203964 (S Rogers)</p>
<p>Additionally, we would like to flag the Buglife mapping of Important Invertebrate Areas (IIA) as these support some of Britain's rarest species and possess unique assemblages of invertebrates. There is currently a small section of IIA mapped within South Cambridgeshire, associated with the Fens IIA. For any proposals in or near to an IIA, we recommend that site design (especially any on-site BNG, Green Infrastructure or SuDS) and ongoing management (i.e. Landscape Environmental Management Plan) should aim to protect and enhance habitat features for invertebrates.</p> <p>Buglife has produced a general guidance note on practical measures to achieve this and is developing site-specific profiles.</p> <p>Solar panels adjacent to running water can also attract aquatic invertebrates with reflected polarised</p>	<p>207622 (Natural England)</p>

Summary of issues raised in comments	Comments highlighting this issue
light appearing as suitable egg laying sites. We therefore recommend that solar proposals in these locations should follow the advice in the Fens IIA profile (page 12) that patterned, roughened or painted glass, or a horizontal light-blocking grid can be used to reduce the attraction of solar panels to aquatic invertebrates.	
rural active t[r]avel routes should be bridleway to include equestrians	203967 (S Rogers)
<p>The limited examples of sites achieving 20% BNG are seen as exceptional, primarily involving employment and NHS (public sector) developments, with only one housing scheme (Waterbeach) mentioned, which has faced delivery issues.</p> <p>Concerns are raised that the proposed policy requirement contradicts Government policy and has not been shown to be justified or viable; the respondent advocates for aligning the policy with National and Legislative requirements while encouraging additional gains where feasible.</p>	209751 (Endurance Estates)
Biodiversity- maximise greenery along all arterial roads ad commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.	210353 (Community Campaigner D Barton)
SCC encourages that the Mitigation Hierarchy is applied in full by improving the wording of part 7 to include compensation.	210639 (Transport 2000 Cambs & W Suffolk)
I very much support the inclusion of the Gog Magog Hills and chalkland fringe as a priority for enhancing the green infrastructure. However, the Gog Magog Hills will be seriously impacted if the	208182 (J Coppendale)

Summary of issues raised in comments	Comments highlighting this issue
<p>CSET is built on its currently proposed route. There appears to be a glaring inconsistency between the strategies for transport and for green infrastructure.</p>	
<p>Broad support for policy. However, clause 3:</p> <ul style="list-style-type: none"> • the Local Nature Recovery Strategy is inaccurate and hence the parish would not benefit from delivery of replacement habitat within areas identified as LNRS priority areas. The LNRS needs urgently amending to recognise Wandlebury Country Park and Magog Downs (both are County Wildlife Sites) and Clay Pit and Beechwoods (a Local Nature Reserve), as designated in Policy NH/5: Sites of biodiversity or geological importance. We cannot fathom their omission from the LNRS. • where neighbourhood plans are in place and have identified suitable off-site locations for BNG within the neighbourhood area in circumstances when BNG cannot be fully delivered onsite, they should supersede delivery via biodiversity credits or schemes registered with Defra. Otherwise, the net result will be biodiversity depletion of not just the development site but also the wider locale. The latter is recognised in para 5.11 but a logical solution, as proposed here, is not provided. See clause 4 of Policy S&GS 10: Mitigation hierarchy and delivering biodiversity net gain and enhancements for how Stapleford and Great Shelford Neighbourhood Plan addresses this issue 	<p>210923, 210924 (Great Shelford Parish Council)</p>
<p>Three key factors contribute to the success of the farmland birds and other wildlife in the fields around Nine Wells:</p> <ul style="list-style-type: none"> • The geology of the site – the low chalk hill of White Hill with the flatter surrounding fields provides an important foundation. This produces the springs that are a vital source of water and essential for the populations of water voles, dragonflies and other aquatic plants and animals. 	<p>210886 (J Meed)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • The variety of habitats – copses, hedgerows, ditches, ponds and grassy and flower-rich margins – provide an important complement to the arable fields. They offer food, shelter and nesting habitat for the endangered farmland birds and brown hares, and they also help to explain the richness of the overall flora and fauna across the site. • The management of the land – the restrained use of pesticides, the approaches to cultivation, the attention to spring chick food and winter bird food – all help to create space for nature. 	
<p>Please implement national planning practice guidance (NPPG) Natural Environment 2025 paragraph 017, with regard to at least one swift brick per dwelling on average for new developments. Also incorporate any local Swifts Group advice received.</p>	<p>204461 (Swifts Local Network: Swifts Planning Group)</p>
<p>The link for NPPG Natural Environment 2025 paragraph 017, from which text can be copied regarding at least one swift brick per dwelling on average for new developments, is here: https://www.gov.uk/guidance/natural-environment</p>	<p>205272 (Swifts Local Network: Swifts Planning Group)</p>
<p>Policy supported but could be made stronger in the following areas.</p> <ul style="list-style-type: none"> ➤ Suggest that the policy should explicitly state that 10% BNG is a minimum expectation, not the desired outcome, and require higher BNG in defined circumstances (large sites, strategic allocations, sensitive locations). <p>Suggest a requirement for BNG to contribute toward ecological connectivity i.e. creation and enhancement of ecological networks including river corridors and habitat stepping stones as set out in the Cambridgeshire Nature Recovery Strategy.</p>	<p>204521 (Max Fordham)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The respondent objects to the wording of Policy BG/BG, stating that the proposed 20% BNG uplift for major development is unsound and lacks adequate justification.</p> <p>The respondent argues that the uplift is not supported by a robust evidence base and does not demonstrate proportionality or deliverability across all sites.</p> <p>The national BNG framework should guide local requirements, which must be justified, flexible, and based on site-specific ecological capacity.</p> <p>While biodiversity enhancement is supported, a blanket approach could hinder site delivery and overlook the merits of individual sites.</p> <p>Policy BG/BG may undermine policy certainty by imposing a fixed uplift that exceeds the national framework without sufficient justification. Any BNG above the mandatory 10% should be considered a material benefit in planning decisions, rather than a strict policy requirement.</p>	<p>203933 (Emmanuel College, Wilberforce Road), 204137 (Emmanuel College, Long Road)</p>
<p>We recommend the inclusion of a clear requirement for biosecurity measures to prevent the spread of invasive species. Development proposals must demonstrate implementation of recognised protocols such as 'Check, Clean, Dry' to minimise the risk of transferring invasive non-native species. This aligns with national biosecurity best practice.</p> <p>In relation to Long-Term Management and Monitoring while the Local Plan acknowledges the need for 30-year management agreements for BNG sites in the Topic Paper section 3.40, this requirement should be broadened and made explicit for all biodiversity enhancements, not just those linked to</p>	<p>211163, 211164 (Environment Agency)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>BNG. The Local Plan should require developers to submit a funded HMMP for every habitat creation or enhancement measure. Funding must be guaranteed upfront to cover maintenance, monitoring, and reporting for a minimum of 30 years, ensuring ecological integrity and compliance over the long term.</p>	
<p>Paragraph 5.16: We have looked at the HRA, although it acknowledges that it is important to consider “in-combination effects” (its paragraph 3.24) it does not consider the EWR project, a strategic project on which the development at North Cambourne is said to depend, which has the potential to impact significantly the Eversden and Wimpole Woods SAC. This deficiency must be remedied. In responding to EWR's 2024 non-statutory consultation, both SCDC and Cambridgeshire County Council expressed significant concerns about EWR’s proposals and their potential adverse impact on the maternity roost of rare barbastelle bats at the SAC. We are assuming that neither GCSP nor its constituent local authorities want to see this rare population wiped out - there is no evidence that captive breeding is possible and the bats cannot be moved.</p>	210927 (Great Shelford Parish Council)
<p>We strongly support the ambition to double nature recovery. In particular, we ask whether the Local Plan could be used more proactively to increase residents’ access to nature and promote active travel, for example by creating new rights of way into and across adjacent farmland or nature reserves. Many new developments remain designed with a single point of access focused on car use. Could stronger requirements ensure that developments are better connected to surrounding farmland, green spaces, or nature reserves? In addition, the Plan provides little detail on the five</p>	211004 (Cambridgeshire County Council)

Summary of issues raised in comments	Comments highlighting this issue
<p>proposed “dispersed” green infrastructure initiatives. While some of these may be achievable, it is unclear how they will be delivered in practice. Further clarification is also needed on how the Plan will actively promote and support environmentally friendly farming.</p>	
<p>Whilst the evidence base supporting the Draft Plan identifies opportunity for green infrastructure provision (Greater Cambridge Green Infrastructure Mapping Baseline Report 2020); the Councils’ justification of the need for the uplifted net gain requirement is wholly reliant upon the Cambridgeshire Doubling Nature Vision. This document is not considered to represent an appropriate piece of evidence on which to base the justification for the uplifted net gain requirement proposed, as this document presents a vision for doubling nature, rather than an assessment of the locally specific need for implementing uplifted net gain requirements. Additionally, the evidence base supporting the draft Policy does not include consideration of the viability implications for major developments to apply the proposed 20% net gain requirement.</p>	211283 (Woolstington One Ltd)
<p>The green spaces that separate Longstanton from the new Northstowe development are of historic significance and should not be re-classified for housing.</p>	208461 (Longstanton PC)
<p>Support for policy but concerns about applying to healthcare uses.</p>	205111 (NHS Cambridgeshire and Peterborough Integrated Care Board)

Summary of issues raised in comments	Comments highlighting this issue
<p>Proposed amendment to align with Government guidance, to read: "Planning applications subject to mandatory BNG will require a biodiversity gain plan to be submitted to, and approved in writing by, the LPA prior to commencement of development".</p>	<p>211397 (Bidwells on behalf of Pemberton Family and Pemberton Family Trusts), 211398 (Quod on behalf of Cambridgeshire County Council)</p>
<p>Concerns raised about impact on SME developers of the higher 20% BNG, policy should be consistent with 10% in national guidance.</p>	<p>211462 (Hayfield Homes Construction Ltd)</p>
<p>With regards to Recreational Pressure, Section 6 of the Council's HRA states that the Appropriate Assessment concluded no adverse effect on integrity as a result of increased recreational pressure in relation to Wicken Fen Ramsar site, Fenland SAC and Eversden and Wimpole Woods SAC provided that the following safeguards and mitigation measures are required by the plan and successfully implemented. However, this commitment has not been explicitly included in the draft Local Plan. The wording of policy BG/BG should be amended to include the wording and updated Zone of Influence: "Any development within 10.7 kilometres of Wicken Fen Ramsar site and Fenland SAC and within 5 kilometres of Eversden and Wimpole Woods SAC will include the provision of alternative natural greenspace, specifically designed and managed to alleviate visitor pressure on these Habitats sites".</p>	<p>211086 (National Trust)</p>

Policy BG/GI: Green and blue infrastructure

Abbreviations

PC= Parish Council, DC= District Council, TC= Town Council, LNRS= Local Nature Recovery Strategy, GBI= Green and Blue Infrastructure, UGF= Urban Greening Factor, BNG= Biodiversity Net Gain, GI= Green Infrastructure

Summary of Main Issues:

There was broad support for the policy in principle, which seeks to protect, enhance and integrate green and blue infrastructure networks in Greater Cambridge. Comments were received from a wide range of stakeholders which supported the green infrastructure initiatives. However, FECRA queried how the green infrastructure initiatives will be achieved (especially for the Cam Corridor and chalk streams) without an adequate supply of water. Natural England (NE) welcomed the recognition given to GBI within the Local Plan, noting the many benefits that a high-quality, multifunctional GBI network can have for people and nature. NE also advised that the policy be supported by a design code / guidance outlining good practice in the design and management of GBI.

There was in principle support for an Urban Greening Factor (UGF) for major residential development proposals, or proposals that are predominantly residentially led, from developers and the Universities. Specific points/suggestions for changes were made due to the potential for hinderance to viable development that a requirement for a minimum UGF factor of 0.4 may have. Objections were also received from developers, with UGF seen as a potential conflict with the requirements of other policies set out in the plan (such as Policy BG/BG, Policy BC/TC, Policy BG/EO, Policy WS/NC, and Policy H/SS) and, due to the relationship with other requirements within the plan—such as rooftop solar, BNG, tree canopy and other ecology policies—which is undefined. Combined, these requirements were viewed to potentially constrain viable development. Support for UGF

for major development in Cambridge city was received from the Wildlife Trust but they raised concern in regard to the appropriateness of its application more widely across Greater Cambridge. Comments from Vistry Group note support for UGF for major development but ask for more detail as to what constitutes a 'Greening Factor', including how it is calculated and the types of green infrastructure that contribute towards it.

Concern was raised regarding the clarity of how councils will deliver the strategic GI. Comments from developers related the policy to a lack of allocations in the Local Plan which could make financial contributions towards delivery of the proposed GI strategic initiatives. The Wildlife Trust expressed concern that policy will not contribute meaningfully to the delivery of strategic GI across Greater Cambridge, that the policy by itself will not deliver strategic GI in the right locations and, that it will fail to match needs without proactive policy and site allocations elsewhere in the Local Plan. The Wildlife Trust also highlighted that accessible natural greenspaces in Greater Cambridge are at capacity and delivery of additional capacity is required immediately to address this issue and remove / avoid damage to nature sites including SSSI. Comments from developers and organisations noted that the Local Plan must facilitate delivery of the strategic GI required through both policy and appropriate site allocations now, and that there must be clear funding mechanisms and or enabling development in the right locations. Comments were made that all development should contribute to strategic GI and therefore the Local Plan must include strategic GI within a CIL requirement for new developments.

Several individuals and Stapleford Parish Council supported/acknowledgement the inclusion of the Gog Magog Hills and chalkland fringe in the green infrastructure initiatives however, concern was expressed that there is inconsistency between the draft Local Plan's prioritisation of the Gog Magog Hills and of the negative impact of CSET more generally. Comments from individuals noted that the policy does not mention of Public Rights of Way (PROWS) and that rural active travel routes should be bridleway to include equestrians. The British Horse Society suggested that the policy require development proposals to protect and enhance existing public rights of way, including bridleways and byways and deliver new or improved multi-user

routes as part of green and blue infrastructure networks.

An individual response highlighted that any Local Plans and Spatial Strategies must 'take into account' the relevant LNRS for the planning authority, making clear that the LNRS plays a role in place-making and planning, and commented that none of the policies set out how this ambition will be met. Concerns were also raised about the mapped extents of the Gog Magog Hills in the LNRS.

Further responses suggested that the policy would benefit from clearer, measurable requirements to ensure that green and blue infrastructure is delivered early and is managed for nature and people over the long term. Stapleford Parish Council recommended that the policy prioritise local opportunities for enhancing green or blue infrastructure over off-site solutions when a neighbourhood plan is in place.

Response to the main issues raised in representations

Support for the policy approach is noted.

Considerations of water supply are addressed within the Development Strategy chapter and supporting evidence, in combination with the water efficiency standards in the Climate Change chapter.

In response to Natural England's request for a GI design code, the policy requires submission of a GI Statement or GI Plan to be submitted with every application for major development helps to ensure that GI is integrated into development from the outset and ensures its long-term management and maintenance. This is supported by the Greater Cambridge GI and Open Space Standards

Framework (2026) (see Chapter 4) which provides guidance which outlines the various requirements needed for GI Statements / GI Plans at various stages of the planning application process.

The requirement for a minimum UGF factor has been added to the plan as a standalone policy, informed by the Greater Cambridge Green Infrastructure and Open Spaces Standards Framework Final Report (June 2026). The report considered the inter-play between all the proposed GI standards to ensure the policy approach was proportionate and robust and concluded that no significant conflicts were found that would impact the final framework. The report also calculated and tested the UGF scores of several previously consented schemes across Greater Cambridge and the analysis concluded that where developments are not currently meeting the target score, there is potential for them to do so through design amendments and without reducing the number of units delivered. It is noted that roof spaces will need to provide renewable energy and contribute to greening and biodiversity, however there are ways to achieve both of these requirements, through bio solar or utilising other ways to deliver greening such as through green walls. Where development is restricted in compliance with renewable energy generation and delivery of greening, innovative designs will need to be explored to deliver this, though it is not anticipated on many typologies. The London Plan successfully applies the urban greening factor of 0.4 and 0.3 and renewable energy requirements to meet both objectives. Requirements for rooftop solar alongside greening policies will be addressed on a case by case basis. The Viability assessment of the Plan demonstrates that the Plan as a whole is viable, considering the impact of the greening policies. Therefore the requirement for the UGF in planning policy is justified and officers have worked with Natural England and LUC to ensure that the policy requirements for UGF as set out BG/UGF are feasible and aligned with national policy and guidance.

In relation to delivering the strategic GI initiatives, the approach has been clarified at Proposed Submission stage via other policies and supporting evidence, including: Where relevant, site allocations in the plan identify green infrastructure measures supporting the relevant green infrastructure initiatives, for example in Policy S/CE Cambridge East; Policy BG/EO requires provision of 7

hectares of Accessible Green Space per 1,000 population for residential led development. It is anticipated that significant proportions of this space need to be delivered offsite, and as such this policy will generate funding towards the strategic initiatives identified in Policy BG/GI. The Infrastructure Delivery Plan supporting the Proposed Submission Plan identifies specific projects that would support delivery of the objectives of the identified strategic GI initiatives. It is anticipated that developer contributions arising from Policy BG/EO will support these and other relevant deliverable projects as they arise. was raised as a concern within the representations. The proposed CIL for Greater Cambridge does not currently address green infrastructure such that for the shorter term funding would likely be secured by S106, but this approach could be revised in the future.

In relation to comments raising the lack of reference to PROWs and horse-riding in the policy with a suggestion for stronger alignment with Policy I/ST, GCSP officers have considered these comments under Policy I/ST and amendments to the policy have been made to require development to provide new and improved opportunities for both recreational and leisure movement. Policy I/ST sets out that development should provide high-quality, attractive new cycle, wheeling, walking and, where appropriate, equestrian routes that secure strong, direct connections through adjoining areas, seamlessly connect to existing routes and address any gaps in the movement network, including the wider Rights of Way network. Additionally, Policy WS/NC has also been updated to include a new point of policy which addresses how new development will be required to provide leisure routes, requiring on or off-site contributions towards improved leisure routes which would include supporting Public Rights of Way Improvement Plans or providing leisure routes.

In relation to concern expressed on the negative green infrastructure impact of CSET, the CSET busway is being progressed by the Greater Cambridge Partnership and is subject to its own planning processes outside of the Local Plan, which include the need to undertake Environmental Impact Assessment.

In response to concerns are raised noting flawed data (inaccurate mapping of the extent of the Hills) and their exclusion from the Local Nature Recovery Strategy, the Magog Down/ Stapleford Pit County Wildlife Site and Wandlebury Country Park are identified on the Policies Map for Greater Cambridge Local Plan and therefore policy BG/BG would apply (this policy controls development affecting sites and species of biodiversity and geodiversity importance); sites of Biodiversity or Geological Importance are identified on the Policies Map and these represent a tiered network for the conservation of biodiversity and geodiversity within Greater Cambridge.

The Councils agree that it is important that the Local Plan ensures that green infrastructure is delivered early and is managed for nature and people over the long term. The requirement in this policy for a GI Plan should ensure that the design of development incorporates GI from the outset, and the requirement for a GI Operation and Maintenance Plan to be implemented for the lifetime of the development should ensure that the implemented green infrastructure is managed for the long term.

Local Plans and Spatial Strategies must 'take into account' the relevant LNRS for the planning authority, making clear that the LNRS plays a role in place-making and planning. The strategic green infrastructure initiatives within the policy (which are identified priorities for enhancing strategic green infrastructure across Greater Cambridge) draw on the Cambridge Nature Network, and Natural Cambridgeshire's other landscape-scale priority areas, such that the Councils' GI initiatives match well with the CP LNRS, albeit they have a broader focus. Policy BG/BG encourages the delivery of offsite BNG within areas identified within the CP LNRS priority areas. Further explanation of how the Greater Cambridge Local Plan has regard to the CP LNRS is set out Appendix 1 of the Biodiversity and Green Spaces topic paper.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Support for the GI policy in principle (protecting, enhancing and integrating green and blue infrastructure networks within new development)	203685 (Cambridge Green Party), 202926 (Cambridge City Council Liberal Democrat Group), 204382 (Bidwells on behalf of Tritax Big Box Developments), 204538 (Max Fordham), 208655 (British Horse Society), 201352 (RSPB), 201381 (Gamlingay PC), 202813 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203561 (P Tribble), 207623 (Natural England),
Specific comments of support for specific parts of the policy. Including support for: <ul style="list-style-type: none"> • The strategic Green Infrastructure (GI) initiatives to enhance GI • reference to Building with Nature Standards 	201352 (RSPB), 209685, 209679 (Stapleford PC), 202087 (Great Shelford

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • the inclusion of allotments and community gardens as identified priorities for enhancing strategic green infrastructure • Policy clause 2b, but advocates for improved links to greenbelt areas to enhance access and reduce car usage, referencing Policy S&GS 19 in the local Neighbourhood Plan. • Policy clause 2c • Food growing space standard 0.4ha per 1,000 population • initiatives to improve the green infrastructure network around Fulbourn, Great Shelford and Stapleford, Landbeach, Milton, and Waterbeach (202584) • support in principle of initiatives to improve the green infrastructure network around Fulbourn (203901) • support in principle of initiatives to improve the green infrastructure network around western edge of Cambridge. 	<p>Village Charity), 202584 (Ely Diocesan Board of Finance), 202702 (S Berridge), 202813 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203132 (M Foote), 203901 (Carter Jonas on behalf of Hill Residential), 204331 (Carter Jonas on behalf of Cambridge Investment Partnership), 204798 (Federation of Cambridge Residents Associations), 204812 (Carter Jonas on behalf of Hill), 205131 (Y Dignon), 205177 (Carter Jonas on behalf of North</p>

Summary of issues raised in comments	Comments highlighting this issue
	Barton Road Landowners Group)
<p>Welcome the recognition given to Green and Blue Infrastructure (GBI) within the Local Plan, noting the many benefits that a high-quality, multifunctional GBI network can have for people and nature in Greater Cambridge. Policy BG/GI reflects the principles set out in Natural England's Green Infrastructure (GI) Framework, and we support their inclusion here. Welcome the work to integrate the GI Framework and Standards into the Greater Cambridge Local Plan and confirmed continued joint working as approach developed/refined. Green and Blue Infrastructure designed in line with these principles can have cross-cutting benefits across many policy areas (e.g. climate, health and wellbeing, LNRS). It can also make a significant contribution towards the overall vision of the Plan (sustainable development).</p> <p>The Plan's major allocations bring opportunities to secure high quality greenspace for Cambridge and deliver GBI in an exemplary way. We therefore support the need for major developments to provide a GI plan (para 5.35) and to integrate GBI early in the design process (Policy BG/GI point 2). This aligns with our GI Strategy Standard and reflects best practice.</p> <p>The 14 strategic projects identified in the Plan will further help to enhance the GI network and may link in with other nature recovery aims (e.g. LNRS priorities).</p> <p>Welcome the work of the LPA to create / enhance green and nature-rich spaces for the benefit of communities across Greater Cambridge. Happy to provide you with support in pursuing a Nature Towns and Cities Accreditation</p>	<p>207625, 207624,207625,207628 (Natural England)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>The A-WINEP region of interest extends to 11 river catchments that include the Cam Lower, and the Cam, Rhee and Granta within the LNRS area. Catchment Plans will be created for the initial 11 catchments within the A-WINEP rural regeneration programme, which will be developed over the full duration of the A-WINEP and will provide a holistic approach to catchment regeneration.</p> <p>Projects that seek A-WINEP match funding must address two primary outcomes:</p> <ul style="list-style-type: none"> • the reduction of nutrient pollution into rivers and • mitigating the impact of low flow. <p>It is considered that our A-WINEP rural regeneration programme will help deliver the strategic aims identified in the LNRS – particularly around climate change, internationally important chalk streams, and water quality and resources</p>	<p>210205 (Anglian Water Services)</p>
<p>The Plan should ensure that sufficient accessible greenspace is provided alongside development. This is particularly important where housing is located close to sensitive sites at risk of recreational pressure (e.g. SSSIs). The ongoing work to define Accessible Greenspace Standards for Cambridge will help to guide this. Development close to protected sites will also need to consider the design of greenspace. For example, a development close to a SSSI may need to consider a higher quantum of a semi-natural typology and ensure there is a sufficient buffer to the protected site. The delivery of GI should also be front-loaded and appropriately phased so that it has chance to establish prior to occupation, in order to function as mitigation. Please also see our comments under ‘New Settlements’ and our response to Policy S/CBN for more on this topic.</p>	<p>207626 (Natural England)</p>

Summary of issues raised in comments	Comments highlighting this issue
Advise that Policy BG/GI is supported by a design code / guidance outlining good practice in the design and management of GBI. This would help to ensure that GBI delivers maximum benefits for Cambridge – for example by informing the delivery of the UGF and securing high quality urban greening	207627 (Natural England)
Policy section 4 text should be amended: 'should aim to' should be replaced by 'must', in line with residential requirements (and especially as the requirement doesn't have to be met on-site)	203561 (P Tribble)
Concern regarding the clarity of how councils will deliver the strategic GI, as allocations are not specified outside of broad areas in the Green Infrastructure Opportunity Mapping.	201352 (RSPB)
Policy would benefit from clearer, measurable requirements to ensure that green and blue infrastructure is delivered early and is managed for nature and people over the long term.	203685 (Cambridge Green Party)
Support for Wildlife Trust's recommendation that all new developments above a certain threshold should contribute to strategic GI provision.	201352 (RSPB)
Request revision to the boundary of Western Gateway multifunctional GI corridors to cover the whole of the Gamlingay parish; to make it easier to administer and apply to all Gamlingay planning applications, and will enable better joined up local wildlife corridor initiatives with neighbouring local authority areas. Another reason to apply this designation to the west of the parish is the proximity to the proposed Large Infrastructure project Tempsford new town and EWRAIL new station planned in Central Bedfordshire parishes.	201381 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
Green corridors must be maintained around all villages and towns. Within context of growing housing development nature must be able to move and access their habitat corridors, not just those few that were designated years ago along the two main rivers and NT areas.	201447 (V McKee)
Comment regarding need for elected governing bodies to strongly deal with all illegal ingress on green spaces in Greater Cambridge.	201447 (V McKee)
No houses or traveller sites should be allowed to encroach on green corridors or open farmland.	201447 (V McKee)
Further gravel extraction for the building trade does not return green land to nature - only to lakes	201447 (V McKee)
<p>Specific comments received in relation to Gog Magog Hills (in Policy BG/GI clause 5(3)):</p> <p>a) Support/acknowledgement for Gog Magog Hills and chalkland fringe inclusion in the list of identified priorities for enhancing strategic green infrastructure across Greater Cambridge.</p> <p>b) Concerns are raised noting flawed data (inaccurate mapping of the extent of the Hills), their exclusion from the Local Nature Recovery Strategy, and negative impacts from CSET:</p> <ul style="list-style-type: none"> • Concern that there is inconsistency between the draft Local Plan's prioritisation of the Gog Magog Hills and their inadequate recognition in the Local Nature Recovery Strategy (impacting biodiversity efforts) • Inaccurate mapping of the Gog Magog Hills has already negatively influenced development decisions, citing a specific appeal case (Rangeford retirement care village) • The Gog Magog Hills are not receiving adequate protection in the evaluation of environmental and landscape impacts related to the proposed CSET busway route. • The plan for a new Busway across the lower slopes of the Gog Magog Hills (CSET) is at odds with this policy, and is not justified in terms of its benefits. 	<p>209683, 209682,209681 (Stapleford PC), 203086 (T Lane), 203171 (J Jasiewicz), 203183 (D Morgan), 203206 (V Morgan), 204115 (A Baker),204460 (N Pond), 204672 (M Fyfe), 204967 (O Arthurs), 205008 (C Arthurs),207658 (K Foreman), 208558 (J Robinson), 202637 (I Smith),</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> The draft plan's busway would damage the Gog Magog Hills, contradicting the green-infrastructure priority, and should be replaced by an on-road A1307 route to protect the hills. 	
<p>Recommendation for policy to prioritise local opportunities for enhancing green or blue infrastructure over off-site solutions when a neighbourhood plan is in place (Policy clause 4)</p>	<p>209680 (Stapleford PC), 208100 (Great Shelford PC)</p>
<p>Policy is lacks mention of blue infrastructure in paragraphs 5.31-5.32 and suggesting that water-related initiatives should be accurately described as such.</p>	<p>201592 (Stapleford PC)</p>
<p>Specific comments received in relation to Public Rights of Way (PROWs):</p> <ul style="list-style-type: none"> Policy does not mention PROWs- PROWs are open to all, free at point of entry, 24/7/365 therefore offer excellent value for money. There are many gaps in the existing network of byways, bridleways and footpaths on the definitive map; these missing gaps in the network must be filled asap due to the ever-increasing busy and dangerous roads. 	<p>201718 (S Jeggo)</p>
<p>Accessible natural greenspaces are at capacity and delivery of additional capacity in all areas north, south, east and west of Cambridge is required immediately to address this issue and remove / avoid damage to nature sites including SSSI</p>	<p>202813 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)</p>
<p>Comments relating to lack of allocations in plan which could make financial contributions towards delivery of proposed GI strategic initiatives. It is not clear how initiatives will be delivered effectively in the absence of related development for:</p> <ul style="list-style-type: none"> No.4 Enhancement of Eastern Fens No.3 Gog Magog and Chalkland Fringe 	<p>201956 (Carter Jonas on behalf of KG Moss Will Trust & Moss Family), 202584 (Ely Diocesan Board of Finance), 203326 (Carter Jonas on</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • No.5 Great Ouse Fenland Arc • No.7 West Cambridge GI Buffer-Coton Corridor • No.2 River Cam Corridor <p>It is considered that draft GCLP needs to better align the development strategy and site allocations with the proposed strategic green infrastructure initiatives, in order to ensure that the initiatives are implemented.</p>	<p>behalf of J Manning), 203901 (Carter Jonas on behalf of Hill Residential), 204208 (Carter Jonas on behalf of Hill Residential), 205177 (Carter Joans on behalf of North Barton Road Landowners Group), 57 (R Harvey), 201975 (Carter Jonas on behalf of Shelford Investments)</p>
<p>Concerns about its effectiveness in delivering strategic GI across Greater Cambridge, not clear at present how the policy aspirations will be delivered.</p> <p>Without a proactive approach to policy and site allocation decisions, the local plan will not meet the strategic GI needs and will therefore not deliver sustainable development.</p> <p>WT believe that the local plan has failed to address the strategic GI requirements of Greater Cambridge area and will not do so unless land can be secured in the right locations. Acknowledge that the Councils</p>	<p>202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>are aware of this as, however addressing this missing aspect of the local plan will be critical in determining whether the plan is sustainable.</p>	
<p>Plan must facilitate delivery of the strategic GI required through both policy and appropriate site allocations now.</p> <p>Immediate action is required to increase capacity for accessible natural greenspaces to prevent damage to existing nature sites, including SSSIs.</p>	<p>202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)</p>
<p>There must be clear funding mechanisms and or enabling development in the right locations to ensure that the Cambridge Nature Network and other strategic green infrastructure is provided to support the proposed population growth.</p>	<p>202815, 202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)</p>
<p>Proposed locations for major new development are not well located to deliver the strategic green infrastructure Cambridge needs in the right locations and may exacerbate pressure on existing nature sites, example given- Grange Farm.</p> <p>WT comment that the site is too small to deliver strategic GI but large enough to add unsustainable pressures on nature sites and country parks. While this development is required to provide funding for</p>	<p>202819 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust), 203210 (Cambridge Past, Present and Future)</p>

Summary of issues raised in comments	Comments highlighting this issue
strategic GI. The reality is that potential providers will not be able to acquire land required south and east of Cambridge due to current owners and development aspirations of those owners.	
The GCLP needs to better align the development strategy and site allocations with the proposed strategic green infrastructure initiatives, in order to ensure that the initiatives are implemented.	201956 (Carter Jonas on behalf of KG Moss Will Trust & Moss Family), 205177 (Carter Joans on behalf of North Barton Road Landowners Group)
Revitalising and protecting streams other than just the (important) chalk streams is important, the protection of blue corridors needs to be broadened to wider set of such corridors. Example given within Girton: Washpit Brook and Beck Brook. Suggestion to require nature-based SuDS and a no-net-increase in downstream flood risk test for developments affecting these catchments.	202168 (Girton Neighbourhood Plan Team), 202219 (Girton PC)
Strong support for revitalising the chalk stream network and for environmentally friendly farming, especially if it is regenerative/organic farming and request to support these farmers.	205191 (M Clarke)
Comment to integrate trees/rain gardens along Active Travel routes to stitch together habitats connecting the Rec, Town End Close, and Hibbert-Ware Garden & Smithy Green, building climate resilience and biodiversity	202219 (Girton PC)
Request to consider areas like Clay Farm Community Garden, The Orchard in Trumpington, the stretch of wood in between and Hobson's brook which needs support.	202472 (F Missler)

Summary of issues raised in comments	Comments highlighting this issue
<p>In principle support for Urban Greening Factor but specific points/suggestions for changes as follows:</p> <ul style="list-style-type: none"> • Rep 202475: comment note taken directly from London Plan/ considered high and that 0.2-0.3 is more appropriate citing UGF discussed within the University for internal projects. Query if UGF is in addition to or part of BNG and if the urban greening factor cannot be delivered on site, would this be directed towards one of the priority schemes at a cost and delivered by others. • Rep 203074: Emerging local plan should clarify that Urban Greening Factor (UGF) is a design tool, distinct from the statutory BNG metric/ clarity on the rationale for a Greening Factor of 0.4 is requested / the minimum scores should undergo Cambridge-specific feasibility testing/ policy should be amended to ensure it aligns with statutory Biodiversity Net Gain (BNG) and GCSP open space contributions and Off-site greening should only be considered after on-site optimisation and must not duplicate existing BNG or open space obligations/ UGF should enable biosolar roofs to avoid conflicts between PV installations and greening initiatives. 	<p>202475 (University of Cambridge), 203074 (Bidwells on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners),</p>
<p>Requirement for a minimum Greening Factor of 0.4 may hinder viable development, conflicting with other policies such as Policy BG/BG, Policy BC/TC, Policy BG/EO, Policy WS/NC, and Policy H/SS.</p> <p>Concerns raised regarding the impact of the greening factor on density uplift and housing numbers outlined in draft policies S/LAC and S/AMC/EB and highlights risks to site viability that could affect the delivery of affordable housing (draft policy H/AH) and infrastructure (draft policy I/ID)</p>	<p>204331 (Carter Jonas on behalf of Cambridge Investment Partnership), 208315 (The Planning Bureau Ltd on behalf of Churchill Retirement Living with McCarthy and Stone)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Objection to 0.4 UGF target as minimum for major development:</p> <ul style="list-style-type: none"> • 204812: 0.4 target may hinder viable development and housing supply due to conflict with other policies. Clarification requested on the definition of urban greening and relation to UGF as per the London plan. Request that the requirement to achieve a greening factor of 0.4 is more aligned with other policy requirements and reflects the feasibility of achieving green infrastructure initiatives. Specifically for the factor to be aligned with 10% Biodiversity Net Gain (BNG) requirements and introducing UGF at a lower initial target of 0.2, with scope for an aspirational target of 0.4 where a site can reasonably accommodate this having regard to viability and other policy considerations. • 205257: GI can be enhanced without such targets and suggestion to remove UGF from policy. Concerns about the lack of assessment regarding the costs of the policy and its potential impact on the net developable area of sites, questioning the justification of the policy. Need for clarification on how the urban greening factor requirement interacts with the 10% biodiversity net gain (BNG) requirement, noting potential overlaps. 	<p>204812 (Carter Jonas on behalf of Hill), 205257 (Home Builders Federation)</p>
<p>Objection to mandatory UGF of 0.3 for non-residential development. The basis for this threshold is unclear, and its relationship with other requirements—such as rooftop solar, BNG, tree canopy and other ecology policies—is undefined. Combined, these policies could constrain viable development, particularly on brownfield or higher-density life science sites. The Greening Factor has not been tested for viability or supported by completed technical evidence, creating risks for deliverability. A more flexible, evidence-led approach is requested, allowing greening levels to reflect site context, viability and other policy obligations.</p>	<p>203358 (Carter Joans on behalf of BMR Granta Park Propco Ltd.)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for Urban Greening Factor for major development in Cambridge city but concern in regards to appropriateness of application more widely across Greater Cambridge. There is a danger that the chosen thresholds may actually deliver less by way of GI than an approach that e.g. identifies a % of development footprint to be devoted to GI. Suggestion that policy should be changed to include an urban green factor of 0.5 for greenfield developments or perhaps better, only applied to the urban area of Cambridge.</p>	<p>202831 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)</p>
<p>Support for paragraph 4 of the policy “all major residential development proposals, or proposals that are predominantly residentially led, must meet a minimum Greening Factor of 0.4”. Suggestion that to avoid ambiguity and ensure consistency in decision-making the policy would benefit from further wording directing readers to supporting paragraph 5.37 which goes into detail as to what constitutes a 'Greening Factor', including how it is calculated and the types of green infrastructure that contribute towards it.</p>	<p>204852 (Turley on behalf of Vistry Group), 210237 (Turley on behalf of Vistry Group)</p>
<p>Concern that policy will not contribute meaningfully to the delivery of strategic GI across Greater Cambridge, that the policy by itself will not deliver strategic GI in the right locations and, that it will fail to match needs without proactive policy and site allocations elsewhere in the Local Plan. Need to understand more about how development will contribute proportionally to the strategic green infrastructure required to support sustainable development within Greater Cambridge area</p>	<p>202813 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust)</p>
<p>All development should contribute to strategic GI and therefore the Local Plan must include strategic GI within a CIL requirement for new developments.</p>	<p>202837 (Bedfordshire, Cambridgeshire and Northampton Wildlife Trust),</p>

Summary of issues raised in comments	Comments highlighting this issue
	203210 (Cambridge Past, Present and Future)
<p>Suggestion to clarify areas targeted in BG/GI by relating them to the boundaries for the Landscape Character Types, for example:</p> <ul style="list-style-type: none"> · Landscape Type 7: Chalk Hills could define spatial focus for initiative 3 · Landscape Type 9: River Valleys could cover the River Cam corridors and the chalk streams that feed them. <p>The southern slope of the Magog Hills in the parish of Stapleford is noted as being particularly well placed for enhancement to environmentally friendly farming and would join several neighbouring restoration projects and contributing directly to GI priorities 1,3 and 10 and to 2 by enhancing the contribution that the Granta tributary makes to the river Cam).</p>	203132 (M Foote)
Suggestion to add the spatially specific GI initiatives to the Local Plan policy map and align them to the existing and potential sites identified (or missed in some cases) from the current Local Nature Recovery Strategy map	203182 (M Foote)
Comment that much of the open space in Greater Cambridge is managed by charities and institutions, complicating the classification and assessment of these areas for strategic GI implementation.	203210 (Cambridge Past, Present and Future).
Rural active travel routes should be bridleway to include equestrians	203967 (S Rogers)
The Levelling up and Regeneration Act (2023) states that any Local Plans and Spatial Strategies must 'take into account' the relevant LNRS for the planning authority, making clear that the LNRS plays a role	204646 (M Clemimson)

Summary of issues raised in comments	Comments highlighting this issue
in place-making and planning. None of the policies set out how this ambition will be met. Could you please describe how planning would reconcile a clash between the LNRS and a proposed development.	
Query as to how the initiatives for enhancing strategic green infrastructure and Dispersed initiatives will be achieved (especially for the Cam Corridor and chalk streams) without adequate supply of water	204798 (Federation of Cambridge Residents' Associations)
Comment that plan identifies 14 strategic green infrastructure initiatives and hope that this includes the recent Mill Road habitat survey (biodiversity and its management).	207538 (M Widdess)
Stronger alignment with Policy I/ST is required. While green infrastructure includes access routes, the policy does not clearly reference public rights of way or equestrian users. Suggestion to policy wording made- Development proposals must protect and enhance existing public rights of way, including bridleways and byways and deliver new or improved multi-user routes as part of green and blue infrastructure networks. Routes should be designed to safely accommodate pedestrians, cyclists and equestrians, including carriage drivers, and provide inclusive connections to the wider rights of way, other settlements and the transport network.	208655 (British Horse Society)
The respondent highlights that the proposed CSET busway route exploits inaccurate mapping of the Gog Magog Hills and conflicts with the green infrastructure aims of the draft Local Plan, suggesting an alternative on-road route could mitigate this issue.	209684 (Stapleford PC)
While it is noted that the Local Nature Recovery Strategy is referenced in Policy BG/RC: River corridors, it is suggested to also reference it within Policy BG/GI policy as well.	210640 (Transport 2000 Cambs & Suffolk)

Summary of issues raised in comments	Comments highlighting this issue
It is noted that for larger developments near the Suffolk border, SCC would look for improved green infrastructure, including PRow, walking, wheeling and cycling and other green access improvements to services over the border. This would be especially true around Haverhill, for example if Horseheath were to expand.	210641 (Transport 2000 Cambs & Suffolk)
I note the rightful inclusion of the Gog Magog Hills and chalkland fringe in the list of identified priorities for enhancing strategic green infrastructure. However, the Gog Magog Hills will be negatively impacted by CSET and despite being a priority for strategic GI are not being accorded sufficient value and hence protection when evaluating the environmental and landscape impacts of the proposed route of the CSET busway. There is, therefore, a glaring inconsistency between the green infrastructure aims of the draft Local Plan and its transport strategy. This inconsistency could be at least partly mitigated if an alternative, on-road route along the A1307 corridor from the A11 to the Cambridge Biomedical Campus was pursued instead. If requested, we can provide more evidence of the benefits of this on-road route.	208409 (M Cooper)
Strengthen Plan-wide policy text on BMV safeguarding and chalk-stream protection (explicit preference hierarchy for land quality; runoff and aquifer protection standards above baseline).	210964 (Great Abington PC)
We request that Policy BG/GI be broadened to protect blue corridors beyond chalk streams, specifically Washpit Brook and Beck Brook, which are important flood risk and biodiversity assets	206162 (Girton Neighbourhood Plan Team)
3.17.1 Tritax support Policy BG/GI. 3.17.2 The policy appropriately recognises the importance of protecting, enhancing and integrating	204382 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
<p>green and blue infrastructure networks within new development. The policy's requirement for development to protect and enhance existing green infrastructure and provide multifunctional, connected and resilient green and blue spaces is consistent with evidence that green infrastructure delivers significant environmental, social and ecological benefits, including biodiversity enhancement, climate adaptation, water management and access to nature for local communities.</p>	
<p>The Plan identifies strategic priorities for increasing and improving green spaces and networks for people and wildlife, including Strategic GI Initiatives which aim to enhance green spaces. CLAF welcomes this approach but emphasises that:</p> <ul style="list-style-type: none"> • Rights of way and public access routes must be fully integrated into Green Infrastructure networks. Strategic green infrastructure planning should explicitly reference legal rights of way and multi-use route connectivity. • Policies should ensure that natural green spaces are not only accessible but are linked by high-quality route networks that support recreational access and sustainable travel. • Consideration should be given to cross-boundary connectivity, ensuring that strategic initiatives do not create fragmented or isolated access corridors. 	<p>208166 (Cambridgeshire Local Access Forum)</p>
<p>We support this policy but would like to see specific reference made to the potential for green and blue infrastructure to reduce flood risk. We suggest expanding part 2.d. as follows: 'd. Resilient – responds to the climate emergency in a positive, contributory way, reducing flood risk where possible.'</p>	<p>211165 (Environment Agency)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>In the GI Supporting Evidence Report Appendix D includes an analysis of how the Accessible Natural Greenspace Standard is met and identifies areas of deficiency. The Wildlife Trust notes the deficiency in the provision of a Sub-regional Natural Greenspace (500 ha) for the whole of the Greater Cambridge area and the deficiency in provision of District Natural Greenspace (100 ha) across most of the area.</p> <p>The Cambridge Nature Network report identified the opportunities to address these deficiencies in three areas to the south and east, west and north-east of Cambridge. It is essential that the Local Plan makes specific provision, if necessary allocating land, to deliver the strategic natural greenspace that will meet the identified needs.</p>	<p>202930 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)</p>
<p>Regarding the Green Infrastructure Emerging Strategy, Standards & Evidence Base Documents there is a lot of good information in the two reports, most of which can fully support, including the majority of the proposed GI standards. However, there are several areas where the document needs to be amended.</p> <p>The reports identify that there is currently 8.7 Ha of accessible green space per 1,000 population across Greater Cambridge and set out a policy to maintain this minimum level of provision in relation to future population growth. From reviewing the evidence we have been unable to find the source reference for this figure. This is critical to understand where the figure is accurate and understand how it was calculated.</p> <p>The report also refer to the Greater Cambridge area exceeding the Fields in Trust recommended standard of 3Ha/ 1,000 population of natural greenspace. This is not an appropriate standard for the</p>	<p>202843, 202850, 202916 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Greater Cambridge area. These standards are more appropriate for other cities and towns with large areas of high quality, bio diverse, accessible countryside. These are often designated as National Parks or National Landscapes with good access provision. However the Greater Cambridge area has none of these and therefore requires a much higher level of provision of strategic natural greenspace.</p> <p>A further consideration is that the provision of accessible natural greenspace is significantly less than required as it is not sufficient to prevent increasing impacts from recreational use of nature sites across Greater Cambridge. The levels of strategic natural greenspace provided over the past 20 years has been insufficient.</p> <p>There is a question as to whether the 8.7 Ha per 1,000 population is either an accurate assessment of quantity or sufficient as the target for overall accessible green space area wide standard? Does this need to be increased to address the impacts on nature sites from unsustainable recent growth and predicted future growth?</p> <p>The Wildlife Trust welcomes the commitment to undertake further work on a SANGS.</p> <p>With respect to costs and implementation, it will be essential to factor in the land acquisition costs in calculating the overall figures for provision of strategic natural greenspace. At present only site creation and management costs over 30 years have been taken into account.</p>	
<p>It is considered that the provisions of draft Policy BG/GI of the Draft Plan conflict with the proposed requirements of Policy BG/BG through identification that, in addition to the biodiversity net gain requirements identified, all major residential developments must meet a minimum Greening Factor of</p>	<p>211284 (Woolsington One Ltd)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>0.4. This would require major residential developments to achieve at least 40% green space provision. Whilst the application of a Greening Factor of 0.4 is consistent with Natural England guidelines, it should be acknowledged within the policy text that this is an aspirational target to be achieved where possible, rather than a requirement which must be met. It is recommended that the policy text is amended to reflect this to ensure that the policy is applied in accordance with Natural England guidance and to ensure that it is clear to both developers and decision makers how they should react to development proposals, whilst providing a reasonable and robust policy framework that supports development being realised.</p>	
<p>In addition to filling in missing natural links, developments should wherever possible provide routes that enable access to the wider countryside, ideally through public rights of way, or otherwise by permissive routes.</p>	<p>210627 (Cambridgeshire County Council)</p>
<p>Concerns raised about introduction of UGF with no evidence base, viability and NPPF requirements for clarity and enforceability.</p>	<p>211406 (Perisimmon Homes East Midlands)</p>
<p>Policy BG/GI clause 5(13) – we fully support the inclusion of allotments and community gardens as an identified priority for enhancing strategic green infrastructure across Greater Cambridge.</p>	<p>210933 (Great Abington PC)</p>
<p>Inconsistency between the draft Local Plan, which prioritises the Gog Magog Hills for enhancing strategic green infrastructure, and the Local Nature Recovery Strategy, which inexplicably fails to recognise them appropriately. There is no recognition of Wandlebury Country Park or Magog Downs in</p>	<p>210932 (Great Shelford PC), 209683 (Stapleford PC),</p>

Summary of issues raised in comments	Comments highlighting this issue
the LNRS, all designated in Policy NH/5. Concerns raised about incorrect mapping of network of chalk grassland.	
Concerns raised about mapped extents of the Gog Magog Hills and it excludes Chalk Hill Down which is calcareous grassland.	210931, 210930 (Great Shelford PC)
Comments made about using neighbourhood plans to identify opportunities for GI where the greening factor cannot be met onsite.	210929 (Great Shelford PC)
Concerns raised about routes to improve links to the landscape, rather than just 'out and back' routes.	210928 (Great Shelford PC)
Support, as blue/green infrastructure can provide multi-functional benefits for surface water management.	210577 (Cambridgeshire County Council)
Concerns raised that the policy is overly prescriptive, insufficiently evidence-based and has the potential to conflict with established design frameworks for strategic allocations.	208989 (Barratt Homes Northampton)
Support for the policy, however there are concerns about the level of detail included in these policies.	208456 (The National Trust)
Support for inclusion of the Gog Magog Hills and chalkland fringe in the list of identified priorities for enhancing strategic green infrastructure. However, the Gog Magog Hills will be negatively impacted by CSET.	208409 (M Cooper)
Concerns raised about duplication in this policy including BNG and tree canopy cover.	208354 (Sworders on behalf of T Elbourn)
Concerns raised about site capacity and impact on housing numbers because of these requirements.	208354 (Sworders on behalf of T Elbourn)

Summary of issues raised in comments	Comments highlighting this issue
<p>Redrow requests that the Greening Factor requirement is reviewed and amended as follows:</p> <ol style="list-style-type: none"> 1. Replace the mandatory Greening Factor of 0.4 (residential) and 0.3 (non residential) with a flexible, evidence based standard, such as: <p>“Major development should seek to achieve a Greening Factor that is appropriate to site context, viability and other policy requirements, and should demonstrate how green and blue infrastructure has been maximised through a design led approach.”</p> 2. Require the Local Planning Authority to produce a technical evidence base demonstrating: <ul style="list-style-type: none"> o how the Greening Factor has been calibrated, o how it interacts with climate and BNG requirements, o how it impacts viability and density. 3. Ensure that any off site GI contribution requirements are compatible with the national Biodiversity Net Gain framework and avoid double charging. 	<p>204578 (Carter Jonas on behalf of Redrow South Midlands)</p>
<p>Whilst U&C support the provision of well designed, integrated and functional green infrastructure within developments, it is concerned over the apparent duplication of policy and guidance that is referred to in this policy.</p> <p>It requires developments to achieve a number of ‘initiatives’ and ‘objectives’: Urban Greening Factor,</p>	<p>209209 (Urban & Civic)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Green Infrastructure Initiatives and Building for Nature. There is no supporting evidence to demonstrate whether these initiatives' and 'objectives' are all compatible and necessary and how compliance is to be tested. The draft Policy lacks clarity and as written is difficult to interpret.</p>	
<p>Adoption of an Urban Greening Factor Target of 0.4 is applied to 'all major residential development' is also of greatest concern. This method and practice have potential value at a fine grain, small scale and particularly within defined urban sites; it is however extremely difficult to see how it can be scaled up and applied to larger scale development, delivered in phases.</p> <p>We urge SCDC to consider again the practicality of the proposed approach and its purpose when large scale development is subject to broader land use budget calculation and monitoring against prescriptive standards, such as open space provision and biodiversity net gain.</p> <p>Purpose, method and a clear demonstration of it could work is absent and very necessary if this approach is to be considered further.</p>	<p>209210 (Urban & Civic)</p>

Policy BG/TC: Improving tree canopy cover and the tree population

Abbreviations

PC= Parish Council DC= District Council TC= Town Council, RPA= Root Protection Area

Summary of Main Issues:

There was broad support from organisations, public bodies, and individuals for the policy objective of increasing tree canopy cover and enhancing the treescape in Greater Cambridge, and for the policy's aim to protect existing trees and secure further tree planting.

Support for and against the policy requirement for a minimum future tree canopy cover of 30% for major development were received. Comments in support suggested that compensatory canopy increase should be required off-site if less than 30% increase agreed on site and that the percentage required should be relative to distance from site (the farther, the greater the provision). Comment from developers, The University of Cambridge, Anglia Ruskin University and the House Builders' Federation commented that the policy's future tree canopy cover requirement was overly prescriptive/onerous, potentially undermining development capacity and deliverability, density, and viability, and that it is not aligned with national planning policy or with Government's stated growth ambition. There were a few comments that the policy lacked clarity regarding the methodology for calculating tree canopy cover.

Developers also raised concerns around the achievability the policy when considering sites where green infrastructure coverage is already high and where there are competing requirements (such as SUDs and BNG). There was also concern that the policy does not protect hedges, with specific points raised that removal of hedges is detrimental to local bird population.

Comments from wildlife organisations recommended a significant increase to buffer zones where ancient woodlands are close

to major new developments (a specific buffer zone was suggested by Gamlingay Parish Council for a 200m buffer for Gamlingay Wood SSSI); the Forestry Commission commented that the 15m buffer should be an absolutely minimum and only applied where all impacts from development can be demonstrated to be considered and avoided. Anglia Ruskin University and comments from developers suggested that the buffer zone clause of policy should be simplified so that suitable buffer zones from built development are secured for all retained trees proportionate to their status and suggested that Part 7 of the policy should clarify that the 15-metre distance pertains only to ancient woodland. Further comments felt that the policy was unclear as to which areas (public/entirety) it is applicable to and to what scale of development.

Anglian Water suggested that the policy reference that where new trees are provided, consideration must be given to the potential conflict between new trees and built form and be compatible with existing or planned underground facilities (such as sewers).

Response to the main issues raised in representations

In relation to concerns raised about the policy requirement for major development to provide 30% future tree canopy cover, the policy has been amended to remove this requirement from the policy. This change has been made based on updated evidence and consideration of the interrelationship between other GI and open space standards within the Local Plan, as well as comments received to the draft plan policy. Informed by the Greater Cambridge GI and Open Spaces Standards Framework (2026, Chapter 2), an increase in tree canopy cover will be enabled primarily via policies BG/BG and BG/UG, in combination with amended policy BG/TC which encourages the integration of existing and new trees within proposed development schemes and seeks to ensure no net loss of tree canopy and/or hedgerow cover through appropriate replacement planting (to be agreed with the LPA). This will continue to support the Councils' aim of delivering a net increase in tree canopy cover across the district via a policy framework that is clearly written and straightforward to apply, reducing complexity and potential duplication between policies.

In relation to comments suggesting varied metrics for the buffer zones for ancient woodland buffers from development boundaries, the policy continues to ensure that development proposals provide adequate buffers and RPAs around ancient woodland and trees to prevent root disturbance and avoid damage. However, an amendment to the supporting text clarifies that applicants will need to demonstrate that development is in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice (currently that all development near ancient woodland must have a minimum buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage). Additionally, following updated advice from the Woodland Trust, the policy and the supporting text has been amended to set out that development should aim to achieve a buffer of 50 metres from the boundary of any ancient woodland, in line with the Woodlands Trust Guidance; with applicants required to demonstrate the justification for any smaller buffer (this required to be greater than the 15 metres minimum requirement). These amendments provide clarity to what development this policy requirement is applicable to. Additional supporting text has been added to explain why the size of the buffer zone to be provided must be justified and agreed with the LPA where assessment shows other impacts (such as wind dynamics, artificial lighting and recreation impacts post development) are likely to extend beyond the minimum distance.

In response to comments highlighting the potential conflict between new trees and built form, and that planting should be compatible with existing or planned underground facilities (such as sewers), additional detail has been added in supporting text to highlight the need to consider this specific issue at the outset to inform site layout.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Recommendation for increased buffer zones:</p> <ul style="list-style-type: none"> ➤ where ancient woodlands are close to major new developments, in these cases a buffer of 500 metres to 1 kilometre is suggested. This is to protect the ancient Woodlands from the impacts of domestic animal disturbance and predication and, from the recreational disturbance effects from people and dogs. ➤ 200m buffer for Gamlingay Wood SSSI (as set out in Neighbourhood Plan) 	<p>202850 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 201354 (RSPB), 201382 (Gamlingay PC)</p>
<p>Policy is unclear on wording of ancient woodland buffers. It is not clear why a minimum 15m buffer zone from development boundary is required or why it would apply to the red line development boundary should no development take place in proximity to the trees. Suggestions that policy is simplified so that suitable buffer zones from built development are secured for all retained trees, proportionate to their status, that Part 7 of the policy should clarify that the 15 metre distance pertains only to ancient woodland, as suggested in paragraph 5.55 and, that the inclusion of a 15 m buffer zone from “any development boundary” is unnecessary, as it appears to require a buffer zone from any development boundary, irrespective if there are any ancient woodland, ancient and veteran trees, ancient hedgerows trees, or indeed any trees.</p>	<p>204002 (Savills on behalf of Anglia Ruskin University-131574), 204864 (Abbey Properties Cambridgeshire Ltd), 205107 (Lichfields on behalf of Lolworth Developments Ltd-129685)</p>
<p>We would request that the policy also references under clause 4, where new trees are provided, that consideration must be given to the potential conflict between new trees and built form, and be compatible with existing or planned underground utilities (such as sewers). There will be</p>	<p>210206 (Anglian Water Services)</p>

Summary of issues raised in comments	Comments highlighting this issue
certain types of development, where trees are not an appropriate solution i.e. wetland creation, but alternative ecosystem services are delivered	
<p>General support for the policy.</p> <p>Vistry- supports the policy objective of increasing tree canopy cover and enhancing the treescape in Greater Cambridge. Hill-support the protection of existing trees and initiative for further planting.</p>	<p>203211 (Cambridge Past, Present and Future), 202940 (Cambridge City Council Liberal Democrat Group), 202850 (Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust), 201354 (RSPB), 201382 (Gamlingay PC), 204542 (Max Fordham), 204760 (Bidwells on behalf of Vistry-131453), 204816 (Carter Jonas on behalf of Hill-131696), 207629 (Natural England)</p>
<p>Support specific points of the policy, that it:</p> <ul style="list-style-type: none"> Requires development to demonstrate how it will protect 'space below ground' 	<p>201508 (B Greig), 201700 (J Neal), 201837 (T Neal),</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • Ensures when new planting is required that long lived trees are incorporated within the treescape design • Ensures development will not be permitted which involves felling, significant surgery and potential root damage to trees of amenity value unless otherwise approved by the local planning authority on a case by case basis weighing up the impacts of removal against the benefits of the development. 	201864 (J Hurst), 201867 (J Brightman), 202985 (Cambridge G Self), 203595 (Federation of Cambridge Residents' Associations-7033), 203679 (J Johnson), 204648 (M Cleminson), 205455 (C Aman), 205653 (S Buckingham), 205667 (D Storey), 207650 (Duxford PC)
Concerns associated with specific examples of tree felling, loss of hedges, and associated habitat caused by development at Springfield (Cambridge East) and Owlstone Croft.	208875 (R Lambert), 201246 (S Williams)
Text should be amended to 'climate crisis' throughout	201508 (B Greig), 201700 (Dr J Neal), 201837 (T Neal), 201864 (J Hurst), 201867 (J Brightman), 202985 (Cambridge G Self), 203595 (Federation of Cambridge

Summary of issues raised in comments	Comments highlighting this issue
	Residents' Associations- 7033203679 (J Johnson) 204648 (M Cleminson), 205455 (C Aman), 205653 (S Buckingham), 205667 (D Storey), 207650 (Duxford PC)
<p>Concern that policy does not protect hedges. Specific points raised that removal of hedges is detrimental to local bird population especially house sparrows) and suggests consultation with local bird group or similar organisation and suitable replacement planting close to removed hedge as mitigation.</p> <p>Suggestion that hedgerows should meet Wildlife Trust size standards.</p>	<p>201268 (A Layfield), 201508 (B Greig), 201700 (Dr J Neal), 201837 (T Neal), 201864 (J Hurst), 201867 (J Brightman), 202985 (Cambridge G Self), 203595 (Federation of Cambridge Residents' Associations- 7033), 203679 (Jeremy Johnson), 204648 (M Cleminson), 205455 (C Aman), 205653 (S</p>

Summary of issues raised in comments	Comments highlighting this issue
	Buckingham), 205667 (D Storey), 207650 (Duxford PC)
<p>Support for policy requirement for minimum tree canopy cover for major development.</p> <p>Parish Council suggests that policy should specific timeframe for achieving 30% canopy cover, recommending that more than half should be reached within a specified number of years after development starts.</p>	<p>201508 (B Greig), 201593 (Stapleford PC), 201700 (J Neal), 201837 (T Neal), 201864 (J Hurst), 201867 (J Brightman), 203198 (P Tribble), 202985 (Cambridge G Self), 203595 (Federation of Cambridge Residents' Associations-7033), 203679 (J Johnson), 204648 (M Cleminson), 205455 (C Aman), 205653 (S Buckingham), 205667 (D Storey), 207650 (Duxford P C)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Suggestion that policy should require compensatory canopy increase off-site if less than 30% increase agreed on site and that the percentage required should be relative to distance from site (the farther, the greater the provision).</p>	<p>201508 (B Greig), 201700 (Dr J Neal), 201837 (T Neal), 201864 (J Hurst), 201867 (J Brightman), 202985 (Cambridge G Self), 203595 (Federation of Cambridge Residents' Associations-7033), 203679 (J Johnson), 204648 (M Cleminson), 205455 (C Aman), 205653 (S Buckingham), 205667 (D Storey), 207650 (Duxford PC)</p>
<p>Ancient and woodlands tree should be explicitly defined as by the Woodland Trust.</p>	<p>201508 (B Greig), 201700 (J Neal), 201837 (T Neal), 201864 (J Hurst), 201867 (J Brightman), 202985 (Cambridge G Self), 203595 (Federation of Cambridge</p>

Summary of issues raised in comments	Comments highlighting this issue
	Residents' Associations- 7033), 203679 (J Johnson), 204648 (M Cleminson), 205455 (C Aman), 205653 (S Buckingham), 205667 (D Storey), 207650 (Duxford PC)
Issue of loss of canopy cover due to removal of trees without TPOs prior to the submission of planning applications. Recommend that measures be taken to capture data on tree and hedgerow resources before submission of planning applications, suggesting tools like Google Earth could assist in comparing pre-submission resources with those at the application stage.	201593 (Stapleford PC)
Concern that policy point 2 undermines requirement for major development proposals to achieve a minimum future canopy cover 30% on site. Suggestion that policy should be more strongly worded, for example 'only in very exceptional circumstances'.	202074 (J Brightman)
Query around current canopy cover and that commitment to raise canopy cover from 17-19% is very low.	202074 (J Brightman)
Policy fails to inform the extent of canopy on public versus private land. Query as to whether LPA can intervene in the management (above and below ground) for private properties.	202074 (J Brightman)

Summary of issues raised in comments	Comments highlighting this issue
<p>Request that tree canopy gains in Girton Parish are targeted along Active Travel corridors, brook margins, and gateway edges to reinforce habitat and cooling while protecting the Girton Gap. It is sought that the local plan:</p> <ul style="list-style-type: none"> ➤ Prioritise riparian and corridor planting in Girton. ➤ Require replacement ratios and long-term management for canopy assets. ➤ Guard hedgerows and mature trees, particularly within the Girton Gap 	202220 (Girton PC)
<p>Suggestion for approach to hedgerow maintenance along Arbury road- if trees within this hedge were not cut back this would achieve substantial improved tree cover at little or no cost and a greater carbon sink on a busy road running through one of the poorer areas of the city.</p>	202353 (R Lund)
<p>Suggestions that policy should encourage the planting of fruit trees (in residential neighbourhoods)</p>	202836 (Dr H Cook), 208875 (R Lambert)
<p>Policy should be clearer that newly planted trees or existing trees next to new buildings must be given enough room to expand to full maturity (both canopy and roots) over the full time period of their lifetime, to avoid future issue around subsidence or the need to reduce or remove the tree in future. Suggests that root protection barriers or suitably deep foundations should be put in place when developments are built to prevent loss of trees in the future.</p>	202940 (Cambridge City Council Liberal Democrat Group)
<p>View that policy is confusing as it is unclear as to which areas (public/entirety) that is applicable to and to what scale of development (appears to be major- more than 10 dwellings).</p>	203199 (Chaplin Farrant Ltd on behalf of ESCO Prospect)

Summary of issues raised in comments	Comments highlighting this issue
The achievability of policy is questioned when considering sites where green infrastructure coverage is already high and where there are competing requirements such as SUDs and BNG.	203199 (Chaplin Farrant Ltd on behalf of ESCO Prospect), 201676 (Stantec on behalf of British Land)
'Significant' reason for which would justify a canopy cover of less than 30% is not defined by policy.	201676 (Stantec on behalf of British Land)
Replacement tree ratio shall be listed out according to tree trunk diameter and category, unless LPA considers BNG and tree canopy cover sufficient to cover the tree loss.	201710 (K Mak)
The policy is too broad and only focuses on canopy cover and has less emphasis on the 'quality' of any woodland or hedgerow habitat. Policy does not mention 'native' or 'local provenance' tree species and amenity value appears to be given a higher status than ecological value.	202478 (University of Cambridge-130704)
<p>Concern raised that the 30% tree canopy cover requirement for major developments is overly prescriptive/onerous, potentially undermining development capacity and deliverability, density, and viability, and is not aligned with national planning policy or with Government's stated growth ambition.</p> <p>Detailed comments:</p> <ul style="list-style-type: none"> • Policy may impact layouts and the viability of sites given the need to include additional tree planting and the necessary space needed to accommodate this. • Although policy indicates that lower percentages may be accepted where justified, the imposition of a fixed 30% baseline still places significant constraints on viable development 	202795 (Martin Grant Land Limited), 203077 (Bidwells-on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners-1313395), 203364 (Carter Jonas on behalf of BMR Granta Park)

Summary of issues raised in comments	Comments highlighting this issue
<p>and does not strike the appropriate balance between landscape enhancement and the delivery of strategic growth.</p> <ul style="list-style-type: none"> • the 30% canopy requirement sits alongside other policies—the cumulative effect of these policies risks reducing capacity, limiting density, and undermining the deliverability of developments supported by the draft Local Plan. • A fixed canopy cover threshold could impose an additional burden on development viability, potentially compromising the deliverability of schemes and the Local Plan's implementation. • 30% requirement is inflexible and does not account for varying land use needs, making it misaligned with national planning policy and growth ambitions. • Redrow and Hill raise concerns about the compatibility of the canopy target with denser development schemes/brownfield sites due to higher density development requirements and its alignment with other nature strategies, such as Nature Recovery Schemes 	<p>PropCo Ltd-131447), 203409 (Bidwells on behalf of Babraham Research Campus Ltd), 203936 (Bidwells on behalf of Emmanuel College-Wilberforce Road-131570), 204002 (Savills on behalf of Anglia Ruskin University), 204123 (Bidwells on behalf of E W Pepper Ltd-131461), 204135 (Bidwells on behalf of Railpen-131454), 204140 (Bidwells on behalf of Emmanuel College Long Road-131435), 204270 (Bidwells on behalf of Bellway Strategic Land-131588), 204332 (Bidwells</p>

Summary of issues raised in comments	Comments highlighting this issue
	on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd (131586), 204338 (Carter Jonas on behalf of Cambridge Investment Partnership-131440), 204392 (Bidwells LLP on behalf of Tritax Big Box Developments-131432), 204503 (on behalf of Bellway Strategic Land-131458, 204581 (Carter Jonas on behalf of Redrow South Midlands-130695), 204760 (Bidwells LLP on behalf of Vistry-131453), 204816 (Carter Jonas on behalf of Hill-131696), 204864 (Abbey Properties Cambridgeshire

Summary of issues raised in comments	Comments highlighting this issue
	Ltd), 205264 (Home Builders Federation), 207444 (Bidwells on behalf of Pioneer Group Ltd-131935), , 206421 (Barret David Wilson Homes and the North West Cambridge consortium of landowners), 206386 (Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners)
<p>Proposed policy duplicates the BNG framework (tree planting forming a component). The proposed tree canopy requirement is seen as redundant and potentially detrimental, as it may prioritise a single ecological metric over a balanced planning approach.</p> <p>ARU suggests that the policy should identify support for protection (or where appropriate) replacement of existing trees to ensure the existing percentages are not adversely impacted.</p>	<p>202795 (Stantec on behalf of Martin Grant Homes Limited), 203077 (Bidwells on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners-1313395),</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Suggestion that a possible policy distinction between the City and area beyond may be appropriate.</p>	<p>203936 (Bidwells on behalf of Emmanuel College-131570), 204002 (Savills on behalf of Anglia Ruskin University), 204123 (Bidwells on behalf of E W Pepper Ltd-131461), 204135 (Bidwells on behalf of Railpen-131454), 204140 (Bidwells on behalf of Emmanuel College Long Road-131435, 204270 (Bidwells on behalf of Bellway Strategic Land-131588), 204332 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd (131586), 204392 (Bidwells LLP on behalf of Tritax Big Box</p>

Summary of issues raised in comments	Comments highlighting this issue
	Developments-131432), 204503 (Bidwells on behalf of Bellway Strategic Land-131458, 204760 (Bidwells LLP on behalf of Vistry-131453)
There is a lack of clarity regarding the methodology for calculating tree canopy cover. The policy does not specify the Council-approved calculator or metric to be used, which undermines the policy's justification.	203077 (Bidwells on behalf of Barratt David Wilson Homes and the North West Cambridge, Consortium of Landowners-1313395), 203409 (Bidwells on behalf of Babraham Research Campus Ltd), 203936 (Bidwells on behalf of Emmanuel College-131570), 204123 (Bidwells on behalf of E W Pepper Ltd-131461), 204135 (Bidwells-

Summary of issues raised in comments	Comments highlighting this issue
	<p>on behalf of Railpen-131454), 204140 (Bidwells on behalf of Emmanuel College Long Road-131435, 204270 (Bidwells on behalf of Bellway Strategic Land-131588), 204332 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd (131586), 204338 (Carter Jonas on behalf of Cambridge Investment Partnership-131440), 204392 (Bidwells LLP on behalf of Tritax Big Box Developments-131432), 204503 (Bidwells- on behalf of Bellway Strategic Land-131458), 204760 (Bidwells</p>

Summary of issues raised in comments	Comments highlighting this issue
	LLP on behalf of Vistry-131453), 204816 (Carter Jonas on behalf of Hill-131696)
Proposal for minor wording changes to part 3 of the policy to ensure that development applications include an Arboricultural Impact Assessment 'where appropriate'.	203077 (Bidwells on behalf of Barratt David Wilson Homes and the North West Cambridge Consortium of Landowners-1313395)
Suggestion that policy should be amended so that developments are required to demonstrate that they have maximised opportunities to deliver new canopy cover, without imposing a fixed percentage requirement. This would ensure a balanced and realistic policy approach that acknowledges existing woodland assets.	203364 (Carter Jonas on behalf of BMR Granta Park PropCo Ltd-131447)
Policy should make provision for a new 'Forest Graveyard' which would support new tree planting for future generations and protect land from development.	203792 (A Carpen)
Recommended that policy should be strengthened regarding the protection of existing mature trees, securing space for large canopy trees and ensuring their long term maintenance.	203686 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
Request for more guidance on the 'right tree in the right place', noting that some trees are the wrong species for the wrong place. Noted that better design and species choice avoids issue and damage to residential pavements. Suggestion for policy to provide greater specificity in terms of street scape trees.	204001 (Histon and Impington PC)
Suggested that policy should cover improvements to existing residential areas as well as new developments, with consideration given to the link between affluence and tree cover and how to support relevant areas in this.	204084 (B Young), 204542 (Max Fordham), 204920 (Mothers CAN Cambridge)
The canopy cover requirement, combined with other policies, creates competing demands for land, potentially jeopardising deliverability and imposing significant land take. Considered that policy needs to better align with other GCLP policies and housing requirements, in order to ensure that the initiatives are implemented. Suggestion that policy amended to replace the fixed requirement for 30% tree canopy cover with a flexible approach, which is a design-led target that reflects site-specific opportunities and constraints. Vistry note that while the policy appropriately allows for flexibility where a scheme can demonstrate "significant ecological, historical, landscape or operational reasons to justify a canopy cover of less than 30% on site", suggesting that this flexibility should be more clearly and consistently applied throughout the policy.	204581 (Carter Jonas on behalf of Redrow South Midlands-130695), 204816 (Carter Jonas on behalf of Hill-131696)
Policy should in Part 3a, allow for flexibility in preserving trees. Recommendation for addition of 'where possible' to acknowledge situations where tree removal may be necessary due to development needs or health issues.	205264 (Home Builders Federation)

Summary of issues raised in comments	Comments highlighting this issue
Issue of trees and shade in development consultation, that trees should be accompanied wherever possible by benches or resting places for the elderly and to support community. The issue of shade will be of growing importance given climate change.	205291 (D Stoughton)
<p>Point 1: + 30% minimum is supported, with adequate monitoring and enforcement.</p> <p>Point 2: If less than 30% is agreed on site, then compensatory canopy increase must be agreed offsite (the farther, the greater the compensatory provision)</p> <p>Point 3a: hedgerows should meet Wildlife Trust size standards</p> <p>Point 3b support protecting "space below ground"</p> <p>Point 4a change text to "climate crisis" THROUGHOUT</p> <p>Point 4b support "long lived trees"</p> <p>Point 6 strongly support</p> <p>Point 7: ancient and woodland trees must be explicitly defined as by the Woodland Trust</p>	201342 (J Neal), 207662 (K Holland)
Very pleased to see these provisions because tree canopy is so vital from a carbon absorption point of view. Cambridge is already well provided for as a city but our surrounding countryside is very depleted compared with many areas and we need to compensate for that in terms of insect habitat, biodiversity etc.	201477 (S Smalley)
Rural active travel routes should be bridleway to include equestrians.	203969 (S Rogers)
The 15 m Ancient Semi-Natural Woodland buffer is an absolute minimum and should only be applied where all impacts can be demonstrated to have been considered and avoided.	203217 (Forestry Commission)

Summary of issues raised in comments	Comments highlighting this issue
Amend the wording 'trees of amenity value' to 'trees of amenity or ecological value' to broaden protection.	203218 (Forestry Commission)
Please will the Council ensure that trees are protected by increasing the extent of conservation areas? It is too easy to cut down unprotected trees.	202375 (S Hegarty)
Policy PG/TC of the Draft Plan proposes to require that all major development proposals must demonstrate, via a Tree Canopy Cover Assessment, how it will achieve a minimum future canopy cover of 30%. It is considered that this proposed requirement is onerous, and fails to appropriately acknowledge that this requirement will not be achievable on all development sites. Whilst the draft policy text acknowledges that there may be ecological, historical, landscape, or operational reasons to justify why a canopy cover of less than 30% is achievable; the policy must also recognise that there may be viability reasons why that level of tree canopy cover sought is not achievable for developments. To ensure that the application of this policy does not unduly constrain the viability, and resultant delivery of development, it is recommended that the policy is reframed as an aspiration that should be achieved wherever possible. A similar approach has been advocated by the Inspector examining the Dudley Local Plan recently, where modifications have been suggested to 'encourage' delivery of a minimum level of tree canopy cover, rather than require as the Plan originally suggested prior to examination, with the modification suggested to ensure soundness.	211285 (Woolsington One Ltd)
The Wildlife Trust generally supports this policy but the 15 metres buffer zone will be insufficient where ancient woodlands are close to major new developments. In these cases a buffer of 500 metres to 1 Km	202937 (Bedfordshire, Cambridgeshire and

Summary of issues raised in comments	Comments highlighting this issue
will be required to protect the ancient woodlands from the impacts of cat predication and recreational disturbance effects from people and dogs.	Northamptonshire Wildlife Trust)
Vistry support the overall objective of the policy to increase tree canopy cover and enhance the quality and resilience of the treescape across Greater Cambridge. However, while the policy appropriately allows for flexibility where a scheme can demonstrate “significant ecological, historical, landscape or operational reasons to justify a canopy cover of less than 30% on site”, it is considered that this flexibility should be more clearly and consistently applied throughout the policy.	204853 (Vistry Group)
It is more appropriate that the tree canopy cover target is reduced to 20% for the site itself, potentially reflected as a specific requirement in Policy S/CBN.	208266 (Savills on behalf of Martin Grant Land Limited)
Requiring a 30% tree canopy cover especially for small brownfield sites is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF.	208316 (The Planning Bureau Ltd on behalf of Churchill Retirement Living with McCarthy and Stone)
We would reiterate our comments in respect of policies BG/GI, BG/BG and BG/RC, in that these requirements taken together are onerous and have the potential to affect the viability of sites, particularly smaller ones whereby there is not sufficient space on site to accommodate such extensive requirements. We question the justification for the 30% figure, and whether the proposed allocations have been assessed against these proposed policy requirements.	208355 (Sworders on behalf of T Elbourn)

Summary of issues raised in comments	Comments highlighting this issue
<p>Barratt Northampton supports the principle of enhancing green infrastructure, however, we object to Policy BG/TC as it is rigid, prescriptive and has untested requirements which are neither justified nor deliverable across all development contexts. The policy does not sufficiently acknowledge that strategic sites have long build-out periods and phased delivery.</p>	<p>208990 (Barratt Homes Northampton)</p>
<p>Flexibility in policy wording is needed. In particular, paragraph 6 states that development “will not be permitted which involves felling, significant surgery, and potential root damage to trees of amenity value, unless otherwise approved by the Local Planning Authority”, but does not clearly acknowledge that tree removal may in some circumstances be necessary due to factors such as disease, age, structural condition or safety concerns, or where the benefits of development demonstrably outweigh the harm arising from tree loss.</p>	<p>210238 (Turley on behalf of Vistry Group)</p>
<p>Paragraph 3 of the policy sets out detailed submission requirements, including the need for an Arboricultural Impact Assessment, Tree Protection Plan and/or Hedgerow Survey. It is considered that these requirements would be more appropriately addressed through the Local Plan validation requirements.</p>	<p>210239 (Turley on behalf of Vistry Group)</p>
<p>Paragraph 7 of the policy states that development proposals “should maintain a buffer zone of at least 15 metres” from ancient woodland, ancient and veteran trees and ancient hedgerows, but then goes on to state that “the size and type of buffer zone will vary depending on the scale, type and impact of the development”. As currently drafted, this appears contradictory and could lead to uncertainty in</p>	<p>21040 (Turley on behalf of Vistry Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>interpretation. The policy would benefit from clarification as to whether the 15 metre buffer represents a fixed minimum or a guideline that is subject to variation based on site-specific circumstances.</p>	
<p>Your policies on arb impact assessments, canopy cover assessments, long term maintenance of trees and use of UKFS, all align with usual Forestry Commission guidance.</p>	210496 (Forestry Commission)
<p>We are generally supportive of this policy but surprised to see no reference to prioritising native trees and hedgerows.</p>	210934 (Great Shelford PC)
<p>Policy BG/TC clause 1 – would it be possible to state in the policy within what timeframe this 30% canopy cover should be achieved? Or at least that more than half of this 30% canopy cover should be achieved within x years of development commencing.</p>	210935 (Great Shelford PC)
<p>P467, para 5.43 – we agree that LPAs need to understand the existing tree resource so that they can make an informed judgement about what might be needed/appropriate, in terms of tree impact, from development. However, the problem remains that land/homeowners can generally remove as many trees and hedgerows without TPOs as they wish prior to submitting a planning application.</p> <p>Cumulatively, this represents a significant loss of canopy cover over time. Consideration needs to be given to how data on tree/hedgerow resources pre-submission can be captured and compared with the resources in place at the point at which a planning application is submitted. Google Earth or similar could play a role in this.</p>	210936 (Great Shelford PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>Part (2) of the policy is strongly supported and should be retained to ensure that each site can deliver the most appropriate ecological enhancements for its specific context. Achieving 30% tree cover may not always align with the optimal biodiversity outcomes as there are species that prefer an open habitat.</p>	<p>211399 (Bidwells on behalf of Pemberton Family and Pemberton Family Trusts), 211400 (Quod on behalf of Cambridgeshire County Council and Prologis)</p>
<p>The Viability Assessment does not appear to model the costs of achieving and maintaining 30% canopy cover. We therefore recommend amendments to allow existing canopy to count toward the requirement, and to assess canopy at a defined future year.</p>	<p>211407 (Persimmon Homes East Midlands)</p>
<p>Paragraph 7 of the policy states that development proposals “should maintain a buffer zone of at least 15 metres” from ancient woodland, ancient and veteran trees and ancient hedgerows, but then goes on to state that “the size and type of buffer zone will vary depending on the scale, type and impact of the development”. As currently drafted, this appears contradictory and could lead to uncertainty in interpretation. The policy would benefit from clarification as to whether the 15 metre buffer represents a fixed minimum or a guideline that is subject to variation based on site-specific circumstances.</p>	<p>(210240 Turley on behalf of Vistry)</p>

Policy BG/RC: River corridors

Abbreviations

PC= Parish Council DC= District Council TC= Town Council, LNRS= Local Nature Recovery Strategy

Summary of Main Issues:

Broad support for the policy was expressed within the representations from a range of individuals, organisations and public bodies, particularly for provisions related to the maintenance and protection of river corridors. Comments noted that river corridors are essential for biodiversity connectivity, water quality, and climate resilience. There was support for the policy in relation to the restoration of river, floodplain and riparian habitats, the creation of riparian buffer zones and, for the policy's reference to the Local Nature Recovery Strategy (LNRS).

Support was received for the 15-metre buffer (set out in policy), but other comments recommended a larger 50m buffer citing LNRS guidance for chalk streams.

There was concern that the policy over-prioritises tourism/recreation, with multiple recommendations for removal from the policy of the principle that all development along river corridors should be required to support tourism. Concerns were received that the plan insufficiently considers chalk river impacts beyond water abstraction (with a specific concern noting the impact of development on the River Granta chalk stream). Concerns were received about flooding impacts to new development (with a specific comment noting the impact of new development on Elsworth), landscape and also to river protection.

Anglian Water made comment on the need to develop within the riparian buffer zone for certain types of essential infrastructure development because of their statutory responsibilities and consequently requested that the policy be amended

to include essential infrastructure within clause 2. Comments were made by Cam Valley Forum in support of the requirements for creating a riparian buffer zone, but concern raised that policy exceptions could prevent the realisation of this concept. Comments from resident forums recommended requirement that any developments should demonstrate that they will not damage riverine nature reserves, SSSIs and other designated protected areas should be added to the policy.

Comments were made by Cambridgeshire County Council being supportive of the holistic approach taken and they advocate more emphasis on watercourse management and maintenance. Reference should be made to section 25 of the Land Drainage Act 1991 which requires riparian landowners to maintain ordinary watercourses, the Watercourse Reinstatement Guide (2022) and to note that constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under section 23 of the Land Drainage Act 1991.

Further responses suggested that flood zone boundaries should be referenced within policy. Ickleton Parish Council recommend a moratorium on major development in upper Cam valley until cumulative impacts are properly assessed.

One comment provided an outline proposal for a new walk in South Cambridgeshire, linking Cambridge to Wimpole Hall NT Estate along the River Rhee.

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

The policy remains substantively the same as at Draft Plan, noting the broad support for the policy. A change has been made to the policy to include essential infrastructure within clause 2; this change responds to comment received from Anglian water which highlighted that they will need to develop within the riparian buffer zone for certain types of essential infrastructure development (to address both surface water and wastewater drainage). The policy continues to require that in exceptional cases (where development is permitted in riparian buffer zones) that details proportionate to the scale and nature of the development must be submitted. This

insertion and approach is supported by the comments from Anglian Water which state that the need for this exception can be demonstrated.

Requirements within this policy establish riparian buffer zones around watercourses, seeking to ensure that important watercourse habitats are protected from harm that can arise from development during construction and use. The size of these buffer zones have been set according to the River/Ditch definitions within current BNG User Guidance. In response to comments suggesting that a greater distance should be set for these zones citing the LNRS the policy has not been changed on the basis that this would not be proportionate, noting that in many locations there is already development within a few metres of the river.

In response to concerns raised that the policy criteria were not set out in a way which reflected their significance and priority, amendments have been made to reorder the criteria within the policy. Although these amendments do not exactly reflect the suggested order made within the comment received (natural features are second, point b), the listing aligns with the priority order for the key roles, challenges and opportunities for our river corridors as set out in within the supporting text to the policy. Concern was also raised that tourism is over-prioritised in the policy, and that, as worded, the draft plan policy required all development to support recreation and tourism. No change has been made and the proposed policy continues to require development along river corridors to demonstrate how it supports tourism and recreation associated with river corridors in appropriate locations, whilst ensuring that this does not impact negatively on the other roles of a river. Supporting tourism is one of the critical roles which rivers and their tributaries provide in Greater Cambridge; removing this clause would mean that the negative impacts which are associated with tourism would not be required to be considered through policy against the other critical roles which our rivers also provide. To help address this tension an additional paragraph has been added to supporting text which clarifies that for a given development proposal, the challenges and opportunities referenced in the policy will need careful balancing.

In response to the comment that (e)i must be revised to ensure the Cam Valley Trail does not follow the riverbank or floodplain along its full length, to avoid harming sensitive wildlife, the supporting text for the policy has been amended to address this point.

In response to the comments from Cambridgeshire County Council, the suggested amendments have been made in the supporting text. The plan considers chalk river impacts beyond water abstraction under Policy BG/GI (see Strategic Initiative 1 'Revitalising the chalk stream network').

Many comments received raised concerns addressed through other parts of the plan. For example, the policy does not include explicit requirements to prevent inappropriate lighting along river corridors as policy WS/HS sets out that development proposals that include new external lighting schemes or changes to existing external lighting will be permitted where it can be demonstrated that it minimises any impact to wildlife and nature conservation (and where it fulfil the other requirements as set out within policy). Policy protections for nature reserves and SSSIs are set out in policy BG/BG and, requirements for flood risk assessments are set out in policy CC/FM. Comments regarding a moratorium on development in the upper Cam Valley are effectively addressed via evidence supporting the development strategy including water supply evidence, and the impacts of individual sites in the Housing and Employment Land Availability Assessment.

The Councils are supportive in principle of project proposals that support enhanced green infrastructure provision including walks along our rivers. Such projects would need further exploration and confirmation that they have a delivery body to be included alongside others in the Local Plan Infrastructure Delivery Plan.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Strong support for maintaining and improving river corridors due to long-term negative impacts (agriculture, sewage, tourism, neglect).	130922 (S Smalley), 201479 (S Smalley)
Strong support for provisions related to river corridor protection (points 1b–1e).	130698 (J Neal), 202490 (J Neal)
Policy should include explicit requirements to prevent inappropriate lighting along river corridors to protect wildlife and maintain the wildlife corridor.	9404 (H Brown)
River corridors are essential for biodiversity, water quality, and climate resilience. Concern that tourism is over-prioritised; recommendation to remove point 1f requiring development to support tourism.	130746 (Cambridge Green Party)
In delivering essential infrastructure to address both surface water and wastewater drainage, Anglian Water will, as a consequence of our statutory responsibilities, need to develop within the riparian buffer zone for certain types of essential infrastructure development. We consider that the need for this can be demonstrated, but we would request that the policy is amended to include essential infrastructure within clause 2. "...Within these riparian buffer zones, no development shall be permitted except for domestic extensions, soft landscaping, small amenity areas, or proposals where it is necessary for the nature and function of the development such as essential infrastructure requirements. In these exceptional cases, details proportionate to the scale and nature of the development must be submitted for approval to demonstrate:"	210207 (Anglian Water Services)

Summary of issues raised in comments	Comments highlighting this issue
<p>We generally support this policy but would like to see the following amendments:</p> <p>We strongly recommend a re-ordering of policy criteria to reflect their significance and priority.</p> <p>As worded, the implication is that ALL development must demonstrate the requirements in the list. We would like the tourism and recreation clause removed.</p> <p>We would like to see an additional point added, requiring that any developments should demonstrate that they will not damage riverine nature reserves, SSSIs and other designated protected areas.</p> <p>We strongly support the requirements for creating a riparian buffer zone, and are concerned that some of the exceptions suggested could prevent the realisation of this concept. The policy must reflect the good guidance that is now available on establishing such zones.</p>	205461 (Cam Valley Forum)
<p>“River corridors” is an inadequate term; “river meadows” suggested. Supportive of policy but recommends using rivers to disperse tourism more evenly along heritage sites beyond the city centre.</p>	131415 (M Cleminson)
<p>Strong support for policy, particularly restoration of river, floodplain and riparian habitats (1c) and creation of riparian buffer zones (2). Highlights role in natural flood management.</p>	8820 (RSPB)
<p>Support for 15 m water buffer; suggest referencing flood zone boundaries within policy.</p>	7618 (Gamlingay PC)

Summary of issues raised in comments	Comments highlighting this issue
<p>Local rivers (Washpit & Beck Brooks) should be specifically named and protected. Development must demonstrate no increased flood risk and deliver biodiversity gain. Requests nature-based riparian buffers, SuDS, and integration with active travel routes.</p>	<p>131255 (Girton PC)</p>
<p>Development should consider the global and local importance of chalk rivers, not only water supply issues.</p>	<p>131341 (S Berridge)</p>
<p>Strong support for policy; reiterates the suggestion to replace “river corridors” with “river meadows”. Recommends using rivers to spread tourism to wider heritage locations.</p>	<p>131356 (Riverside Area Residents Association)</p>
<p>General support but recommends substantial restructuring of point 1 to reflect true priorities (natural features first). Suggests removing requirement for all developments to support tourism. Recommends adding a requirement to avoid damage to protected nature sites; supports 15 m buffer but rejects proposed exceptions.</p>	<p>131723 (Cam Valley Forum)</p>
<p>Recommends 50 m buffer rather than 15 m, citing LNRS guidance for chalk streams. Wider buffer necessary to reduce nutrient runoff and bank erosion.</p>	<p>131762 (I Walters)</p>
<p>Riverside area in Cambridge should be enhanced as the city’s only fully continuous pedestrian riverside route. Recommends improvements to water quality, seating, safety, and heritage interpretation to also relieve pressure from the city centre</p>	<p>131790 (D Spiegelhalter)</p>
<p>Policy should remove exemptions allowing development within riparian buffer zones. Recommends adding protection for nature reserves and SSSIs, plus developing an overarching strategic river vision similar to the Thames Landscape Strategy.</p>	<p>7033 (Federation of Cambridge Residents’ Associations)</p>

Summary of issues raised in comments	Comments highlighting this issue
Concerns about flooding impacts of new development on Elsworth. Development would worsen existing flood risk to homes; asks how this will be prevented	130812 (H Dawson)
Draft plan insufficiently considers chalk river impacts beyond water abstraction. Policy wording needs strengthening; recommends input from Hobson's Conduit Trust.	130958 (Stapleford PC – NP Steering Group)
Support for policy but point (e)i should clarify that the Cam Valley Trail route must avoid riverbanks and floodplains to protect sensitive wildlife. Supporting text should note entire Cam's historic and cultural significance.	1801 (Cambridge Past, Present & Future)
Recommend moratorium on major development in upper Cam valley until cumulative impacts are properly assessed. Protection should extend into Uttlesford through Duty to Cooperate. Serious concerns about landscape and river protection.	203453 (Ickleton PC)
Support for the policy.	202938 (Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust)
Support a water buffer of 15m, consider referencing flood zone boundaries in addition.	201383 (Gamlingay PC)
Active travel routes and PROWs should be bridleway to include equestrians	203971 (S Rogers)
We welcome this Policy and the reference to the Local Nature Recovery Strategy (LNRS) for additional guidance.	207630 (Natural England)
River corridors are essential for biodiversity connectivity, water quality, and climate resilience. The policy should prioritise natural river function and habitat quality. We share	203689 (Cambridge Green Party)

Summary of issues raised in comments	Comments highlighting this issue
<p>residents' concerns about the impact of tourism on the natural environment and the quality of life for local residents. We do not accept the principle that all development along river corridors should be required to support tourism, and we therefore recommend that sub-paragraph 1f is removed from the policy.</p>	
<p>Ickleton PC suggests a moratorium on large development proposals in the upper Cam valley from Stapleford to the boundary with Essex until impacts of developments (including cumulative impacts) given permission in recent years or planned for in this and the adopted Local Plan are properly considered following the rollout of such developments. E.g., Spicers site, Genome Campus, Sawston housing, Unity Campus, Whittlesford Parkway Area. This is essential if you are serious about protecting the River Cam and the landscape around it. Under the Duty to Cooperate with Uttlesford DC protection of the upper Cam valley should extend into that District.</p>	203464 (Ickleton PC)
<p>This policy is well supported.</p>	210674 (Newnham Labour)
<p>The respondent objects to the proposed wording of Policy BG/RC, stating it adopts a restrictive approach that undermines effective land use, contrary to NPPF 2024 Chapter 11 and NPPF 2026 L2.</p> <p>The blanket requirement for riparian buffer zones of 15m from riverbanks and 10m from ditch bank tops could sterilise significant areas of land, especially in rural and edge-of-settlement sites.</p>	204405 (Tritax Big Box Developments)

Summary of issues raised in comments	Comments highlighting this issue
<p>Relying on definitions from the BNG framework risks equating minor or engineered land drains with natural watercourses, imposing fixed buffer requirements regardless of ecological function.</p> <p>This approach lacks proportionality and may reduce developable area, constrain site layouts, and undermine development capacity, conflicting with national policy objectives.</p> <p>The respondent recommends amending Policy BG/RC to adopt a more flexible, site-specific approach that differentiates between natural watercourses and engineered land drains.</p> <p>Changes to plan: 3.19.6 Policy BG/RC should therefore be amended to adopt a more flexible, allowing for a site specific approach that distinguishes between natural watercourses and engineered land drains.</p>	
<p>Protection of the river corridor is supported. Policy wording should also include requirement to prevent inappropriate lighting on the river corridor (including internal and external lighting) to minimise impact on river wildlife and to maintain a wildlife corridor.</p>	202498 (H Brown)
<p>We argue the 10 m ditch-buffer requirement exceeds national guidance and could sterilise land.</p>	208356 (Mr T Ebourne, Sworders)
<p>We welcome the inclusion of this policy and are generally supportive of the wording.</p> <p>However, we recommend the inclusion of an additional bullet point under part 2. to ensure there is no cumulative loss of floodplain storage due to development within riparian buffer zones, which could increase flood risk elsewhere. We suggest using the following</p>	211166 (Environment Agency)

Summary of issues raised in comments	Comments highlighting this issue
wording: 'd. that there will be no loss of floodplain storage or impedance to flood water flows.'	
The LLFA are pleased with the holistic approach taken to promote surface water management, SuDS, water quality, biodiversity, and climate change. We highly advocate more emphasis on watercourse management and maintenance. Reference should be made to section 25 of the Land Drainage Act 1991 which requires riparian landowners to maintain ordinary watercourses. In addition, Cambridgeshire County Council's Flood Risk Team have published The Watercourse Reinstatement Guide (2022). Please note, constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under section 23 of the Land Drainage Act 1991.	210506 (Cambridgeshire County Council)
There is a specific need to consider the impact of development on our chalk rivers and river corridors in greater Cambridge because of their local and global significance, something which neither Policy BG/RC nor its supporting text fails to do. We recommend seeking input from, amongst others, Hobson's Conduit Trust, for how to improve the wording and strength of this policy.	210937 (Great Shelford PC)
Both the CamToo1 and CamToo2 schemes would increase approximately 50% the length of prime training water accessible downstream from the city boathouses, relieve pressure on one of the most intensively used sporting assets in Cambridge. There is a question of whether there are opportunities for this to be explored in policy.	210713, 205928 (Eastern Region Rowing Council)

Summary of issues raised in comments	Comments highlighting this issue
Growth in participation in rowing has been constrained by limited river space, safety considerations and conflicts between different river users.	205929 (Eastern Rowing Council)
Please consider the impact of development on our chalk rivers because of their local and global environmental significance not just because of water supply.	207433 (S Berridge)
Re-order the list in point 1 to create a different hierarchy.	207581 (Federation of Cambridge Residents' Associations)
Remove exemptions from Riparian buffer zone, the Cam needs a strategic vision like the Thames Landscape Strategy and generally exemptions listed in the policy should be removed.	204553 (Federation of Cambridge Residents' Associations)
Strong supports this policy, which responds to the need of protecting our rivers, safeguarding our views to them and enhancing our relationship with them. But use of river should be dispersed from the overcrowded centre and description should include river meadows.	204663 (Riverside Area Residents Association), 204671 (M Cleminson),
15m buffer not in line with LNRS recommendations for a 50m buffer, a 50m is mandatory to reduce nutrient run-off and bank erosion.	205073 (River Corridors)
A continuous pedestrian boulevard will encourage views and enjoyment of the wildlife. Improvements would include the quality of the water, provision of seating, providing a safe environment for both pedestrians and cyclists, and supporting the development of the industrial heritage through a 'heritage trail', improved signposting. All this would also contribute to drawing tourists away from the city centre.	205301 (D Spiegelhalter)

Summary of issues raised in comments	Comments highlighting this issue
<p>Flooding is a serious concern in Elsworth, new housing would further reduce the capacity of the land to hold excess water and may impact on the flooding on existing homes.</p>	<p>201337 (H Dawson)</p>
<p>RSPB supports this policy. Rivers and streams and their associated riparian habitats provide important wildlife corridors within the Greater Cambridge area. In particular we are pleased to see Point 1c on the restoration of river, floodplains and riparian habitats and Point 2 on the provision of riparian buffer zones.</p>	<p>201355 (Royal Society for the Protection of Birds)</p>
<p>The draft Greater Cambridge Local Plan lacks cohesive consideration of the environmental impact of development on chalk streams and river corridors, which are of local and global significance, focusing instead on how over-abstraction places limits on development.</p>	<p>201611 (Stapleford PC)</p>
<p>Girton's Washpit Brook and Beck Brook are locally critical river corridors for ecology, flood paths, and connectivity; they must be explicitly protected.</p>	<p>202221 (Girton PC)</p>
<p>The respondent supports the policy but requests a revision of bullet point (e)i to clarify that the Cam Valley trail should not follow the riverbank or be located in the floodplain along the entire river length to protect wildlife. The respondent notes a lack of supporting text that describes the necessary balance between river biodiversity and public access, despite the policy mentioning the need for balance. The respondent suggests that the supporting information should acknowledge the historic and cultural significance of the entire stretch of the Cam from Byron's Pool to Baitsbite Lock.</p>	<p>203216 (Cambridge Past, Present and Future)</p>

Summary of issues raised in comments	Comments highlighting this issue
Support for the protection and enhancement of River Cam. Point 1a should be revised to: a. Protects and enhances important views to and from the river." To reflect views from a conservation area.	211530 (Turley on behalf of Trinity College, Cambridge)
The College considers that the introduction of Riparian Buffer Zones in Part 2 of the policy. is excessive and unnecessary. Imposing a blanket restriction on development with a fixed buffer of 10m fails to take into account the considerable variation in the existing and historic development pattern along the riverbank and associated watercourses. To reinstate a 10-15m buffer zone along the river Cam would significantly harm the character and appearance of many established areas, the vast majority of which are protected by Conservation Area designation.	208296 (Turley on behalf of Trinity College, Cambridge)
In respect of paragraph 2, the policy would benefit from clarification as to whether the buffer requirement applies consistently to both sides of a watercourse in all circumstances, or whether a more flexible, site-specific approach may be appropriate depending on the nature of the watercourse, surrounding land uses and environmental constraints.	210241 (Turley on behalf of Vistry Group)
Outline proposal for a new walk in South Cambridgeshire, linking Cambridge to Wimpole Hall NT Estate along the River Rhee.	211991 (D J Hope), 211992 (D J Hope), 211993 (D J Hope)494

Policy BG/PO: Protecting open spaces

Abbreviations

PC= Parish Council DC= District Council TC= Town Council, LGS= Local Green Space

Summary of Main Issues:

Broad support from a range of individuals, organisations, and public bodies for the protection of open space as it makes an important contribution towards the wellbeing of residents and character of place. Comment that open space must be protected, expanded but never reduced. Comment that open space within a new community should be automatically protected from the start.

Concern that the policy includes an allowance for the reprovision of open space elsewhere if a site were lost to development, that sites are identified with qualities inherent to the space in its particular location, with the suggestion the policy could be strengthened through the removal of clauses 2 and 3 or setting a high bar to justify their loss. Comment from house builders seeking flexibility with the requirement for the new space to be provided before the site can be redeveloped to consider the delivery and phasing of the development.

Sport England objected to the Draft Plan policy on the basis that it did not take into account development that prejudices playing fields nor prevent playing field being built on unless an assessment had been undertaken which clearly shows the open space, buildings or land to be surplus to requirements.

Comments suggesting additional areas of open space that have not been identified on the policies map, or seeking the removal of protection from designated sites.

Response to the main issues raised in representations

In response to comments that new open spaces, such as those delivered through new development, should be automatically protected once they are provided, the policy applies to both designated and undesignated open spaces that meet the criteria for designation. Whilst undesignated open spaces may not be designated on the Policies Map, which is only updated periodically, where they can be demonstrated to meet the identified criteria they can receive protection from the policy.

In response to concerns raised about the loss of open spaces to development and comments about strengthening the policy by setting a higher bar to meet to justify loss of open space, the policy objective is to protect open spaces from development. The tests for permitting loss of open space through development are considered to be strong and clear, and requiring like or better quality provision. The policy wording has been strengthened in a different way to ensure new development would not harm the 'function and quality' as well as character of open spaces, to ensure that development does not undermine the integrity of or people's ability to use and enjoy the spaces. An amendment to the supporting text clarifies that applicants will need to demonstrate a clear need for development which cannot be met elsewhere. Whilst house builders sought greater flexibility regarding the requirement for the new space to be provided before the site can be redeveloped, this point has been retained to ensure continuous access to open space for the local community.

Comments objecting that the policy did not take into account development that prejudices playing fields nor prevent playing field being built on unless an assessment had been undertaken which clearly shows the open space, buildings or land to be surplus to requirements, have been considered. As previously, the Proposed Submission policy has been amended to ensure

new development would not harm the ‘function and quality’ of open spaces. The policy element requiring any loss to be “satisfactorily replaced to an equivalent or better standard in terms of quality, quantity and accessibility” follows national policy, and is a high bar, and will ensure no loss in open space provision.

The Protected Open Space Review 2026 provides updated evidence for the designation of open spaces shown on the Policies Map, and Appendix E details how sites suggested through the Draft Plan consultation have been considered.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Comment that Protected Open Space is of vital importance and should be protected and enhanced</p> <ul style="list-style-type: none"> • contribution to the wellbeing of residents, • contribute materially to the character of villages • must be protected, expanded but never reduced • access to open spaces near to homes and communities is very important. • open spaces near to housing are vital to successful placemaking • Strongly support the need to protect existing open spaces particularly in northern parts of the city where residents have only limited access • Support this policy- and the importance of Village Amenity areas to rural parishes in particular • Ickleton PC strongly supports this policy. We are pleased to note that existing identified Local Green Spaces will be carried forward from the 2018 Adopted Plan. 	<p>201017 (M Colville), 201384 (Gamlingay PC), 202173 (M MacGinley), 202948 (Cambridge City Council Liberal Democrat Group), 202956 (Cambridge City Council Liberal Democrat Group), 203466 (Ickleton PC), 205354 (M Page)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>We support stronger protection for open spaces. Policy should set a much clearer presumption against the loss of existing open space, including smaller spaces that provide local cooling, biodiversity, and everyday access to nature.</p>	<p>203690 (Cambridge Green Party), 204747 (Maria Cleminson)</p>
<p>Comment that Protected Open Space should be protected and enhanced to resist erosion of the City's key green areas due to development. Policy should be strengthened by removing clauses 2 and 3, which require replacement open space to be provided in an alternative location or where it meets demonstrable educational need.</p> <ul style="list-style-type: none"> • Colleges can override POS by adding learning spaces that could go elsewhere, giving them an unfair advantage over the needs of long term residents and future generations • leaves much loved POS vulnerable to the growing pressures for development in the city centre • We note that open spaces near to housing are vital to successful placemaking and that off site provision should not replace the need for open spaces accessible to residents nearby. • Section 2 needs to be strengthened, removing 'where this is feasible and effective', which is so weak that it provides a get-out option that renders the policy ineffective. 	<p>201317 (Cambridge Architectural Research Ltd (CAR)), 202215 (L Fleming), 202956 (Cambridge City Council Liberal Democrat Group), 203560 (P Tribble)</p>
<p>Policy does not achieve its objective of protecting open space. The qualities inherent to a space, particularly its environmental qualities, are part of that space in its particular location. 'Accessible Green Space Accessibility Standards' are general and an inappropriate benchmark for relocation; takes no account of the inherent environmental qualities or the importance of locale. Spaces are protected for an evaluated defined reason. Needs to be a more compelling argument than exceptional circumstances.</p>	<p>204943 (North Newnham Residents' Association), 208619 (Madingley Road Area Residents Association)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Concern about criteria 2b, which requires replacement open space to be operational before the loss of existing space.</p> <ul style="list-style-type: none"> • This requirement may not consider practical challenges related to site deliverability, especially for brownfield sites. • Request flexibility to allow for an interim period for replacement open space to be operational. • Timing of any replacement will need to take into account delivery and phasing of a development and given that the replacement will be a condition of the permission granted there is sufficient certainty that replacement open space will be provided. • To request that replacement open space does not need to be in operation prior to any loss and an interim period can be allowed for to accommodate for any associated replacement, and such flexibility is introduced in the policy wording of BG/PO. 	<p>204345 (Cambridge Investment Partnership), 205283 (Home Builders Federation), 204828 (Carter Jonas on behalf of Hill)</p>
<p>Concern that educational needs should no longer be a reason for building on POS. Colleges or schools need to detail why they could not meet their needs in an alternative way, such as by building on a brownfield site, with reference made to NE Cambridge being specifically assigned for CU development.</p> <ul style="list-style-type: none"> • Option for POS to be replaced within a 400-yard radius is deleterious to the neighbourhood good • Since these two provisions are peculiar to Cambridge and do not appear in the National Plan and elsewhere in the country, that they should be deleted • Benefit to any college does not and should not supersede the benefit to the residents of the City • Hughes Hall College propose to build on Fenners Cricket Ground, a Protected Open Space and Local Green Space • Green spaces are a dwindling resource as it is and should be protected 	<p>201347 (L Sheffield), 201515 (L Messenger), 201674 (R Wymer), 201692 (I Bent), 201796 (A Wall), 201842 (H Glaisyer), 201908 (J Wren), 202213 (J Reid), 202216 (M Reid), 202647 (T Murphy), 202655 (E O'Brien), 204959 (D Davies), 205392 (M Jones), 2015176 (L Walker)</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • POS should be protected so all residents of the city can benefit be that through, sport, leisure or general health and wellbeing • Definition of 'education needs', was originally intended for predominantly U.18 education. • Environmental benefits of a space are inherent to the location of a space itself • 'Demonstrable' must taken seriously, otherwise, in the context of currently planned expansion, appeals to "demonstrable education need" will eventually wipe out all protected space. • Welcome student accommodation at Eddington to create an enlarged radius around the centre, allows the expansion in harmony with a sustained balance between built and open spaces. • I think the caveat of protection except for 'demonstrable education need' makes the designation too vulnerable in Cambridge where universities and colleges own so much green space. 	
<p>Comment that clause 1 appears to be aimed at sporting facilities, but should also take into account that the green space in an area should not be reduced to the general detriment of that area.</p>	201361 (M Blackburn)
<p>Comment that sites are missing or should be amended:</p> <ul style="list-style-type: none"> • Stapleford cemetery – cemetery, and provides recreation and access to views of Magog Hills • Draft Policies Map requires updates to include new open spaces, Local Green Spaces, and Protected Village Amenity Areas from Stapleford & Gt Shelford Neighbourhood Plan adopted in October 2025 - Stapleford's cemetery (land north of Mingle Lane), Gt Shelford's cemetery (off Cambridge Rd), Gt Shelford's Davey Field Rugby Football Ground (off Cambridge Rd), More's Meadow, Gt Shelford (site ref. ZA 032) is incorrectly placed, new countryside park (Chalk Hill Down) between Haverhill Rd (Stapleford) and Hinton Way (Gt Shelford), Clay Pit on Granhams Rd. • Leadwell Meadows/Pocket Park (Linton) should be recognised as Protected Open Space 	201186 (M Foote), 201613 (Stapleford PC), 201671 (Linton PC), 205198 (M Widdess), 208635 (Duxford PC), 208636 (Duxford PC), 202218 & 202223 Girton PC, 208047 (Little Shelford PC), 201165 (J Hunter), 205434 (Papworth Everard PC),

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • I cannot see references to Mill Road Cemetery but hope this important site is mentioned somewhere. It is a closed Victorian cemetery, consecrated, and maintained as both a cemetery and a large green space. As Parishes Committee Chair representing churches owning the land, I much appreciate the Council's care of the site with local and Council volunteer support. It is a significant asset in this built-up area and contributes to meeting the Council's statutory open-space provision. • Duxford's Brewery Field should be designated as a LGS – owned and maintained by Duxford PC, improvements funded by Friends of Duxford Green Spaces, supported by local business. Meets criteria – key location near recreation ground, community centre, offers easy access to wildlife corridors and is a crucial link within Duxford Nature Network. Used by local community for exercise, pleasure, relaxation, picnics and dog walking. We will further improve biodiversity. • Please name and protect Girton's Washpit and Beck Brooks, and recognise the Girton Gap as a strategic ecological and identity asset. Assess Area 11 (Hibbert-Ware Garden & Smithy Green) for POS and LGS to ensure protection and enhancement consistent with Local Plan definitions. • The allotments and Campkin Close (Little Shelford) have been upgraded to protected open space (Council are very happy with that) the rest of the PVAA area is the same except the area on the corner of Whittlesford Road/Church Street is now not shown and Council think it should be as it was previously included. • Park+Gardens at Bell School of language - The "green area" covering the gardens of the Bell school should extend further north towards Red Cross Lane along the boundary with the Greenland Estate where there are large trees, some may have a TPO, and a wildlife area. • Papworth Everard Parish Council cannot see that: 1) the PVAA designations in Papworth Everard of Policy NH/11 of the adopted Local Plan 2018; 2) the Local Green Space sites NH/12-062 - Jubilee Green, Papworth Everard, NH/12-063 - Meadow at western end of Church Lane, Papworth Everard, NH/12-064 - Papworth Hall, Papworth Everard and NH/12-065 - Village 	<p>202089 (Great Shelford Village Charity), 210938 (Great Shelford PC), 211258 (Friends of St Matthew's Piece), 211259 (Friends of St Matthew's Piece), 211260 (Friends of St Matthew's Piece), 203977 (DP9 on behalf of Trinity College, Cambridge),</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Playing Field, Papworth Everard of the adopted Local Plan 2018; 3) the Conservation Area; 4) the SSSI and Woodland Areas; or 5) the Papworth Everard Village Design Guide SPD (and other important aspects/policies/considerations) have been carried forward from the adopted Local Plan 2018. These remain valid for the reasons set out in full, as fully evidenced based, in the adopted Local Plan 2018. The reasons and evidence remain current and valid, and justify their maintenance.</p> <ul style="list-style-type: none"> • Great Shelford Village Charity is broadly supportive of this policy but notes that the open space designation at its own open space at More’s Meadow, Gt Shelford (site ref. ZA 032) is in the wrong place. The designation incorrectly applies to land which has been developed since 2021 by Great Shelford Village Charity as affordable almshouses and should instead be immediately to the NW of this on land allocated to allotments and a community garden. Please amend the designation accordingly. • Land adjacent to and north of 118 York Street (which itself is CB1 2PY) (Site ID 116411) has been submitted for for use as open space / green infrastructure in the Local Plan. • Land adjacent to and southeast of Gibson House (the York St Medical Practice & pharmacy at 146-148 York St, CB1 2PY) (Site ID 116412) has been submitted for use as open space / green infrastructure in the Local Plan. • Land Opposite 16 St Matthew's Street, Cambridge CB1 2LT (Site ID 116434) has been submitted for for use as open space / green infrastructure in the Local Plan. • TCC recognise the importance that open spaces play across Cambridge Science Park. TCC OBJECT to the inclusion as currently outlined on the draft policies map. Should other employment sites also have the application of policy BG/PO then for Cambridge Science Park an amendment to the draft Polices Map to show the areas of Open Space within Cambridge Science Park is suggested in the attached plan. 	

Summary of issues raised in comments	Comments highlighting this issue
Protected Village Amenity Areas or areas identified as Local Green Space should not include any Anglian Water assets such as sewer pumping stations, which may require future development / expansion to address matters such as capacity issues.	210208 (Anglian Water Services)
Girton welcomes mapped open-space designations but is concerned that BG/PO treats Local Green Space (LGS) less protectively than national policy that requires "exceptional circumstances." Where a site is both POS and LGS, the LGS protection should prevail.	202222 (Girton PC)
Open Space within a new community should be automatically protected from the start. Opportunities should be taken to restore lost historic open spaces. Development should not be permitted if it impairs community access to and use of protected open space. Eg. access to Fenner's ground should not have been removed as part of college development, and should be restored when possible.	205202 (L Walker)
Strongly support inclusion of "undesignated areas" in point 1, "suitable distance" in point 2a, "before" in point 2b. Strongly support points 4 and 5. Suggestion for including in point 1 that any 'Open Space' with a new development must be automatically "protected" from the start, and every opportunity must be taken to restore lost historic protected open space. Point 3 needs strengthening; development should not be permitted if it impairs community access to and use of protected open space.	201509 (B Greig), 201424 (J Neal), 201838 (T Neal), 202986 (Cambridge G Self), 203687 (J Johnson), 204677 (M Cleminson), 204717 (M Cleminson), 205459 (C Aman), 205647 (S Buckingham), 205670 (C Coombs), 205671 (M

Summary of issues raised in comments	Comments highlighting this issue
	Golder), 207499 (Duxford PC), 207666 (K Holland)
<p>We support this policy and the reference to Natural England’s Accessible Greenspace Accessibility Standards to guide the location of replacement open spaces.</p> <p>We also agree with the requirement for the replacement site to be ‘fully available for use before the area of open space to be lost can be redeveloped’. We advise that this requirement should apply to any open space to meet the recreation needs of a population, whether it is replacing a lost amenity or not.</p>	207631 (Natural England)
<p>Land use, nature and orchards: some losses are irreversible</p> <p>Orchards, mature trees, historic green spaces and productive landscapes are non-renewable assets. Once removed, they cannot be meaningfully replaced within a generation.</p> <p>Any proposal that: • removes orchards; fragments countryside; or damages established ecosystems; must clear an exceptionally high bar of necessity, not convenience.</p> <p>Development should: prioritise previously developed land; protect productive and historic landscapes; • and avoid environmental harm justified solely by transport ideology. Sustainability must include ecological realism, not just transport metrics.</p>	208839 (D Smith)
<p>Point 1: Inclusion “undesigned areas” – strongly support.</p> <p>Point 1 (Add) Where loss permitted, agree replacement should be like for like or better.</p> <p>Point 1 (Add): 'Cultural character & Biodiversity, including that relating to semi-natural areas and</p>	204065 (Federation of Cambridge Resident’s Associations)

Summary of issues raised in comments	Comments highlighting this issue
<p>informal green space, should be key in assessing open space quality</p> <p>Point 2a: Open spaces in this policy already subject to official evaluation. Needs more compelling argument to allow evaluation to be overridden.</p> <p>Point 2b: “before” – strongly support.</p> <p>Point 3 Strongly object. Delete. Undermines whole purpose of strategy. Why should educational establishments be privileged?</p> <p>Points 4 & 5: – strongly support</p>	
<p>Vistry recognise the importance of delivering high quality and accessible open spaces as an integral part of new development and support the overarching objective of Policy BG/EO to ensure that development “addresses the open space needs it generates”, secured through an appropriate mix of on-site provision and/or financial contributions for off-site provision, enhancement and management. Vistry's proposals at Balsham Road, Linton would deliver open space opportunities and green infrastructure, and Vistry would welcome ongoing engagement with the Councils, key stakeholders and the local community to ensure that provision responds effectively to local needs and aspirations.</p>	204854 (Vistry Group)
<p>Sport England objects to this policy as currently drafted as it does not align with paragraph 104 of the NPPF. The wording of the policy does not currently take into account development that prejudices playing fields nor does it prevent playing field being built on unless an assessment has been undertaken which clearly shows the open space, buildings or land to be surplus to requirements. We implore you to list management arrangements also within the criteria of replacement facilities. Reason being is</p>	209228 (Sports England)

Summary of issues raised in comments	Comments highlighting this issue
<p>equivalent or better accessibility and management arrangements are required to minimise any detrimental impact on the users of an existing area of playing field from relocation to a new area of playing field.</p>	
<p>Within the supporting information you may wish to clarify what a suitable location is. Within Sport England's Playing Pitch Policy and Guidance it sets out that a suitable location is a place to which current or former regular users of a playing field, or those who may want to use the playing field now or in the future, can conveniently gain access by a variety of transport modes. The location of playing fields relative to those who use them, or who may wish to do so, is an important consideration in determining whether there is sufficient supply.</p>	209229 (Sports England)
<p>In terms of point 3, under Policy BG/PO, Sport England recommend removing the wording 'adversely affecting' to 'result in the loss, or prejudicing the use of playing field'. Reason being is considering whether a playing field is adversely affected, is a matter of judgement. In contrast paragraph 104 of the NPPF applies to any development resulting in the loss, or prejudicing, the use of playing field unless it meets one of three criteria. The wording of para 104 of the NPPF does not consider if the harm is adverse, but whether the criteria has been met.</p>	209230 (Sports England)
<p>Where new development is likely to increase recreational pressure on the countryside, CLAF supports:</p> <ul style="list-style-type: none"> •Proactive mitigation measures, including improved access infrastructure and circular routes, to disperse recreational use and reduce impacts on sensitive landscapes. 	208169 (Cambridgeshire Local Access Forum)

Summary of issues raised in comments	Comments highlighting this issue
<p>•Securing access improvements through planning agreements to ensure timely delivery and long-term maintenance.</p>	
<p>We welcome the proposed standard of 0.4 ha of allotment space per 1,000 population.</p>	206957 (Y Dignon)
<p>We welcome the updated Girton Policies Map and see it as a significant improvement on the 2018 version.</p> <ul style="list-style-type: none"> • We would like more open space areas to be designated directly on the Policies Map rather than via the Neighbourhood Plan, because the Local Plan carries greater weight. • We argue that protection of open spaces, local green spaces, PVAA and ICF should be at least as strong as the NPPF, with ‘exceptional’ circumstances judged locally rather than at the Greater Cambridge level. <p>We recommend that the listed sites (Area 2, Areas 3-4, Areas 5-6, Area 7, Area 8, Area 9, Area 10, Area 11, ICF 1 and ICF 2) be designated as Protected Open Spaces, Local Green Spaces or Important Countryside Features to safeguard flood control, wildlife, landscape and community values.</p>	206158, 206159, 206160, 206163 (Girton Neighbourhood Plan Team)
<p>This comment relates to the role of green separation between Northstowe, Oakington and Longstanton as part of the area’s green infrastructure. The land between these settlements provides ecological connectivity, landscape character and access to countryside for nearby communities. If such areas are not clearly identified and protected, their function as green infrastructure will be eroded incrementally. The Plan should recognise green separation not merely as residual land between allocations, but as a positive asset contributing to biodiversity, wellbeing and the distinct identity of surrounding villages, and should designate and protect these areas accordingly.</p>	204421 (Cllr T Bygott)

Summary of issues raised in comments	Comments highlighting this issue
<p>I am seeking clarification on the current protections for Longstanton Paddocks. It remains unclear as to why it is not designated as Protected Open Space. I attended a public consultation with a representative from the Longstanton District Heritage Society and appreciated the feedback received post meeting via email, but I still find the protections against development unclear for the Paddocks. I wish to highlight the need for clearer information regarding existing policies that govern the land and its development protections. In addition, I have some questions related to the draft local plan Map & potential traveller sites (Ref attachments)</p>	<p>201695 (P Harradine)</p>
<p>Written confirmation is requested by the Parish Council that the area known as “Western Park” in Northstowe and “The Paddocks” in Longstanton, between Rampton Road, The Manor, Grove Cottage and Toad Acres will remain as an open green space and will not be developed for any purpose. These areas of beauty and historic importance within the Parish of Longstanton will remain that way and will not be designated as areas to locate further housing in addition to those already provided within the main body of Northstowe.</p> <p>Concerns extend to other parts of the village which currently provide green separation from current and future development, including strips of land at the St. Michael's end of Longstanton, the meadow adjacent to Western Park and Magdalane Close, currently believed to be designated sports land, Longstanton and an area separating Prentice Close, Longstanton from Northstowe</p>	<p>208462, 208463, 208464 (Longstanton Parish Council)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>We support the principle of a mixed-use development at North Cambridge Academy delivering about 150 homes and a community sports hub.</p> <p>Request that the northern part of the North Cambridge Academy site be removed from the protected open space designation to allow flexible mixed-use development.</p>	206130, 206140 (Meridian trust)
<p>The College objects to Policy BG/PO's wording, arguing it imposes a rigid presumption against development affecting protected open space, which contradicts national policy requiring a balanced assessment. The Site, currently private and not publicly accessible, does not function as open space of public value, conflicting with the objectives of Policy BG/PO's supporting text. The College highlights that the Site is within development extents and not designated as Green Belt, suggesting Policy BG/PO's absolute restriction on development hinders sustainable land use. The College intends to retain a significant portion of the Site as open space, proposing redevelopment to enhance public access and community benefit. The College asserts that the Site is surplus to its sports requirements, with alternative facilities available, and that redevelopment would not diminish sports provision.</p> <p>The College requests modifications to Policy BG/PO to allow development where private land has limited public access, replacement open space is provided, and development benefits outweigh the loss of open land.</p>	203941 (Bidwells on behalf of Emmanuel College)
<p>We would like to know what evidence planning officers will use when deciding between housing provision and protecting open space where the Local Plan objectives conflict. The six-storey flats</p>	206189, 206190, 202285 (I Cooper)

Summary of issues raised in comments	Comments highlighting this issue
<p>proposed for Arbury Court would eliminate the protected Arbury Court Play Area, contravening Policy 67 (open space protection) and Policy 68 (on-site open space provision).</p> <p>The proposed new square does not deliver the same play equipment, grass area and functions as the existing play area, so it fails to provide an equal or better replacement as required.</p>	
<p>Why does the land adjacent to Badgers Holt have a Protected Open Space policy while the paddocks and the land next to the Toads Acre mobile home do not?</p>	205900 (P Harradine)
<p>While the importance of green space is acknowledged, the scale of the proposed Protected Open Space allocation at Park at St Peter's Lane is disproportionate when viewed in the context of existing protected open and green spaces within Papworth Everard.</p> <p>The proposed designation is not supported by robust, site-specific evidence and does not demonstrate that the land is of sufficient environmental, recreational, or community value to warrant protection under draft policy BG/PO. As a result, the allocation would unnecessarily constrain sustainable development opportunities in the future on a site set within the defined edge of the bypass, including the delivery of much-needed housing, in a location that is well related to the existing settlement and its services.</p> <p>The imposition of extensive designations across land owned and controlled by Varrier-Jones Foundation, without prior engagement with the landowner, is unduly restrictive and risks prejudicing the ability of the emerging Local Plan to respond flexibly to future development.</p>	203398 (Bidwells on behalf of The Varrier Jones Foundation)

Summary of issues raised in comments	Comments highlighting this issue
Open spaces should include bridleway perimeter routes or cross routes so that horse riders are included.	203972 (S Rogers)
Objection to the inclusion of Protected Open Spaces at Cambridge Science Park, as outlined on the draft policies map.	211494 (Trinity College, Cambridge)
Support for policy.	210939 (Great Shelford PC)
Land adjacent to and north of 118 York Street (which itself is CB1 2PY) (Site ID 116411) has been submitted for for use as open space / green infrastructure in the Local Plan.	211258 (Friends of St Matthew's Piece)
Land adjacent to and southeast of Gibson House (the York St Medical Practice & pharmacy at 146-148 York St, CB1 2PY) (Site ID 116412) has been submitted for use as open space / green infrastructure in the Local Plan.	211259 (Friends of St Matthew's Piece)
Land Opposite 16 St Matthew's Street, Cambridge CB1 2LT (Site ID 116434) has been submitted for for use as open space / green infrastructure in the Local Plan.	211260 (Friends of St Matthew's Piece)
Views of Protect Fenner's Action group made known to Planning Authority and college proposing development on POS (Hughes Hall development plans on Fenner's ground).	205176 (L Walker)

Policy BG/EO: Providing and enhancing open spaces

Abbreviations

PC= Parish Council DC= District Council TC= Town Council, AGS= Accessible Green Space

Summary of Main Issues:

General support from a range of individuals, organisations, developers, and public bodies for the policy in principle and for the policy objectives in protecting and enhancing open spaces for recreation, health and wellbeing.

Support was also received for the inclusion of an accessible green space (AGS) standard. Comments from a group of individuals strongly supported the requirement for an AGS standard for commercial development. Natural England commented that appropriate AGS quantity standards will be key to addressing recreational pressure issues in Greater Cambridge. Comments highlighted the need for further review once an AGS quality standard has been confirmed for residential and commercial development.

Some developers expressed the view that the policy was too rigid, and does not account for the varied operational and spatial needs of employment and commercial development in Greater Cambridge. It was noted within comments that the quantum of AGS that a proposal can deliver will very much be dictated by site context, constraints and opportunities and will need to be recognised in the policy. Concerns were raised by developers that a generic open space requirement could hinder site layouts and reduce development capacity, conflicting with national policy and the Government's growth ambitions. The House Builders' Federation objected to the introduction of a standard for major residential development suggesting that where there are play spaces within

close proximity to a development it may be a more effective approach for improvements to be made to those spaces rather than requiring provision on site.

Objections from developers were received on the lack of clarity on the standards, the lack of a defined methodology for calculating greenspace requirements and that the policy aim is not clearly explained to plan users. Concerns were raised about the accuracy of the Green Infrastructure Strategy mapping, the reported 8.7 Ha of accessible greenspace per 1,000 population (and whether this figure is sufficient to meet future needs), and the risk of overlapping and conflicting requirements which may make viability and deliverability challenging. A further comment was received which stated that referenced data used by GCSP is not up to date.

Further responses highlighted the importance of including land acquisition costs in the overall figures for strategic natural greenspace provision. The Wildlife Trust suggested an accessible natural greenspace standard in addition to the calculated parks, open space and recreation space standards. A recommendation to increase green space standards for higher density residential developments was received. Comments from a group of individuals and organisations advocated for integrated play and playable landscapes in Cambridge, focusing on how the policy could support the integration of youth and young people with open space, children's play space and public realm provisions.

Comments from individuals and resident association welcomed many aspects of policy but saw the policy as flawed due to open space targets being set for Greater Cambridge rather than wards or sectors within the City, with comments suggesting that public and private open space needs to be tracked by ward or City sector.

Objections from equestrian groups noted that the policy does not explicitly recognise the role of PROWs or provide for equestrian access within or to the provision of open space.

Response to the main issues raised in representations

Support for the broad policy approach is noted.

In response to concerns raised regarding the lack of clarity on the proposed GI standards and their supporting evidence, Based on updated evidence and recommendations from the Greater Cambridge GI and Open Space Standards Framework (2026), the policy now sets out how development proposals will be subject to minimum quantity, quality and accessibility greenspace standards, with the Councils seeking to implement Natural England's Green Infrastructure Framework as applied to the Greater Cambridge area. The headline standard is to require Accessible Green Space, which accounts for a range of green space typologies listed in the supporting text.

Concerns about how the policy considered site-specific constraints and opportunities was raised. The quantity standards apply to all qualifying development set out in the policy and can be met by direct provision of new and/or improved open spaces on and/or off-site, or through an appropriate financial contribution to off-site provision as appropriate. Through proactive discussion between developers and the LPA constraints and opportunities can be identified early in the planning process, and parties can agree on on-site vs off-site accessible greenspace provision where relevant (and also how long-term management and stewardship of the GI network will be secured). GI should in general be delivered on-site where feasible, ensuring communities have access. However the Councils anticipate that some elements may be more effectively delivered off-site, where this leads to greater strategic benefit (particularly given that "strategic-scale" GI and open space is identified as critically under-provided in Greater Cambridge within the plans evidence base).

The Greater Cambridge GI and Open Space Standards Framework (2026) tested the appropriateness of each standard to ensure they were realistic and applicable to the Greater Cambridge context; consideration was also given to where and in what situations they should likely apply across the Local Plan area ensuring that the policy sets out a robust set of locally appropriate standards. The use of separate standards for Cambridge City and South Cambridgeshire was considered as part of this process. However, this approach was discounted to ensure consistency with the development of the joint Local Plan (it was also noted that following local government reorganisation, these district boundaries will no longer exist).

In response to comments received on the lack of clarity on the standards, the standards applied in Policies BG/BG, BG/GI, BG/TC and BG/EO are now set out fully within the policies, including setting out clear requirements for a GI Plan and GI Operations and Management Plan to ensure that the policies are implementable, supported by a developer and development management officer user guides set out in the Greater Cambridge GI and Open Space Standards Framework.

In response to comments querying the data informing the standards, the Greater Cambridge GI and Open Space Standards Framework sets out the rationale for each proposed standard, including explaining how the headline 7 hectare per 1,000 population – no net loss- Accessible Green Space standard was derived.

In response to comments highlighting the importance of including land acquisition costs in the overall figures for strategic natural greenspace provision, the policy requirement is set out in terms of space to be provided rather than a cost. Estimates of costs attached to this requirement are set out in the Infrastructure Delivery Plan and have informed the Local Plan Viability Assessment.

In response to comments suggesting green space standards for higher density residential developments, this proposal was explored within the Greater Cambridge GI and Open Space Standards Framework. Including a separate standard for this was discounted on the basis that the proposed Accessible Green Space standard should be flexible enough to address such proposals, however policy point 3b. “Ensures access for all residences within the development to at least one appropriate tier of greenspace within the size-proximity criteria” is aimed at ensuring such proposals enable new residents to have access to green space whilst recognising that in constrained higher density locations there may be less opportunity to provide green space on site.

In response to comments relating to design of open space including for play, the standards help ensure that new developments deliver attractive, accessible and well-designed open space; such spaces have multifunctional benefits which can support and enhance the appearance of an area, create more desirable and healthier places to live and also underpin sustainable growth. The Greater Cambridge Green Infrastructure Strategy aims to improve the quality of green infrastructure in Greater Cambridge by setting out that quality standards should be informed by best practice for the design and management of publicly accessible open space and play provision (this includes the Green Flag Award, The Sensory Trust’s Inclusive access guidance and guidance provided by Play England). However, the Councils are continuing to build on this approach by developing qualitative evidence which will recommend open space quality standards which are proportionate to Greater Cambridge (it envisaged that quality standards will be prepared for open space sub typologies where recreation is the primary function).

In response to comments querying open space targets being set for Greater Cambridge rather than wards or sectors within the City, the application of the requirement for provision to have regard to existing local provision and identified gaps in the relevant space type, including for accessible greenspace when assessed against the size-proximity criteria, will account for varying provision within the local area of development proposals.

See Policy BG/GI for the Councils' response regarding public rights of way and horse riding comments.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Support for policy but query how applies to 'large' commercial development which is proposed in the rural centres and minor rural centres that retain employment functions. Noted that development in these areas may not deliver 100 +employees but request that a scaling should be applied to larger rural applications which are less than 100 employees (perhaps 50 employees +) in these rural centres and minor rural centres to help enhance open spaces in these parishes</p>	<p>201385 (Gamlingay PC)</p>
<p>General support for policy:</p> <ul style="list-style-type: none"> • Comment that open spaces are vital to successful placemaking • Note that off site provision should not replace the need for open spaces accessible to residents nearby • Support is given for the proposed Overall Nature Recovery Area-wide Standard, with suggested revisions for clarity in the wording. • Commendation for the assessment of green infrastructure needs in Greater Cambridge. • Noting the deficiencies in sub-regional and district natural greenspace provision, call for Local plan to address these needs. • Support for policy objectives in protecting and enhancing open spaces for recreation, health and wellbeing • particularly the inclusion of open space management provisions in clause 1 	<p>202959 (Cambridge City Council Liberal Democrat Group), 203339 (Cambridge Past, Present and Future), 203563 (British Horse Society), 203693 (Cambridge Green Party), 201614 (Stapleford PC), 205198 (M Widdess)</p>

Summary of issues raised in comments	Comments highlighting this issue
Comment received advocating for larger, multi-use open spaces for new developments, as smaller fragmented spaces may lack user engagement and essential features for wellbeing.	203339 (Cambridge Past, Present and Future)
Cambridge residents are being deprived of green space through huge numbers of new houses, while leaving villagers with lots of green space.	201247 (S Williams)
Strong support for policy point 3 which requires an Accessible Greenspace standard for commercial development.	201510 (B Greig), 201653 (Neal), 201839 (T Neal), 201871 (J Brightman), 201874 (J Hurst), 202989 (Cambridge G Self), 203688 (J Johnson), 204199 (W Blythe), 204768 (M Cleminson), 205463 (C Aman), 205643 (S Buckingham), 205663 (D Storey)
Suggested that wording added to policy point 1: 'The provision of open space in a new development must take additional and compensatory account of the level of existing provision in the setting, particularly when this is poor.'	201510 (B Greig), 201653 (J Neal), 201839 (T Neal), 201871 (J Brightman), 201874 (J Hurst), 202989

Summary of issues raised in comments	Comments highlighting this issue
	(Cambridge G Self), J Johnson (203688), 204199 (W Blythe), 204768 (M Cleminson), 205463 (C Aman), 205643 (S Buckingham), 205663 (D Storey)
Suggestion to amend policy point 2: The Councils are exploring the potential to require" is unacceptable. Replace by "All development must meet" and delete "major"	201510 (B Greig), 201653 (J Neal), 201839 (T Neal), 201871 (J Brightman), 201874 (J Hurst) ,202989 (Cambridge G Self), 203688 (J Johnson), 204199 (W Blythe), 204768 (M Cleminson), 205463 (C Aman), 205643 (S Buckingham), 205663 (D Storey)

Summary of issues raised in comments	Comments highlighting this issue
<p>Suggestion for addition to policy point 5: 'New development must not use pesticides or herbicides in management of green space or buildings/infrastructure. Any tree guards must be conditioned and enforced as temporary.</p>	<p>201510 (B Greig), 201653 (J Neal), 201839 (T Neal), 201871 (J Brightman), 201874 (J Hurst), 202989 (Cambridge G Self), 203688 (J Johnson), 204199 (W Blythe), 204768 (M Cleminson), 205463 (C Aman), 205643 (S Buckingham), 205663 (D Storey)</p>
<p>Request that village-scale open space for youth, sport, and wellbeing within/near Girton's built-up area (with shared-use agreements with schools) be allocated and designed to connect into Active Travel and biodiversity corridors.</p>	<p>202223 (Girton PC)</p>
<p>Comment that the proposed development of Arbury Court do not apply the principle of this policy. Highlighted that the park provides a vital local amenity for children and that replacement with a smaller area criss-crossed with cycle paths will not be adequate and will result in tree loss.</p>	<p>202352 (R Lund)</p>
<p>Comment that there is a "tiny forest" in Chesterton ad that this is a proven method of increasing biodiversity within tight urban spaces. Such an idea would be ideal for use on the Arbury Town Park</p>	<p>202357 (R Lund)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>which is a large grass area with only a few trees at one end and open to roads on two sides. This would quickly provide more biodiversity and a more interesting landscape.</p>	
<p>Support for policy in principle, noting need for further review once an Accessible Green Space quality standard has been confirmed for residential and commercial development.</p>	202480 (University of Cambridge)
<p>Support for policy in principle and inclusion of an accessible green space standard. Suggested that an accessible natural greenspace standard in addition to the calculated parks, open space and recreation space standards adopted. It may be that the accessible natural greenspace standard is separated and included within the Green Infrastructure policy instead. A natural greenspace standard will form part of strategic GI provision and the provision of SANG.</p>	202934 (Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust)
<p>Comment noting that the Councils are continuing to explore the number of hectares per employee to apply within the requirement for “Accessible Greenspace” (paragraph 3), that standards are important for promoters and developers of employment sites and mixed-use sites to understand as soon as possible, and welcoming the ability to review those standards as early as possible.</p>	207171 (Stantec on behalf of British Land)
<p>Offer to continue to support the councils in developing this policy, particularly in relation to deciding appropriate Accessible Green Space quantity standards. This will be key to addressing recreational pressure issues. NE welcome exploration of the potential to ‘secure provision and/or contributions specifically for large scale green spaces including country parks.</p>	207632 (Natural England)
<p>Comment that the quantum of Accessible Greenspace that a proposal can deliver will very much be dictated by site context, constraints and opportunities and this will need to be recognised in the policy.</p>	207172 (Stantec on behalf of British Land)

Summary of issues raised in comments	Comments highlighting this issue
The best-in-class schemes, which adopt a design-led approach to place-making will naturally cater for accessible public realm and greenspace for future occupiers of the proposed development. In some instances, it will not be appropriate to prescribe a minimum quantum of greenspace to be delivered, if the scheme provides high-quality space as part of its response to the specifics of the site.	
Objection on the basis that policy is unclear, vague and does not explain the aim of the policy clearly to plan users.	203202 (Chaplin Farrant Ltd on behalf of ESCO Prospect)
Recommendation to increase green space standards for higher density residential developments to maintain or improve upon existing generous green space levels.	203339 (Cambridge Past, Present and Future)
<p>Concern about the accuracy of:</p> <ul style="list-style-type: none"> • the Green Infrastructure Strategy mapping, particularly regarding the definition of accessible greenspaces and physical barriers to access (specific recommendations include omitting private lands and spaces smaller than 0.5ha from accessible greenspace calculations and addressing issues with Coton Countryside Reserve classification), • the reported 8.7 Ha of accessible greenspace per 1,000 population and whether this figure is sufficient to meet future needs. 	203339 (Cambridge Past, Present and Future)
The importance of including land acquisition costs in the overall figures for strategic natural greenspace provision is highlighted.	203339 (Cambridge Past, Present and Future)
Clarification is sought on the distinctions between Green & Blue Infrastructure standards, with a note on the challenges posed by the management of open spaces by non-public entities.	203339 (Cambridge Past, Present and Future)

Summary of issues raised in comments	Comments highlighting this issue
<p>Objections made due to policies lack of clarity on:</p> <ul style="list-style-type: none"> • The standards currently under exploration (including the required quantum of open space for commercial developments, and around key standards such as Accessible Green Space and outdoor sports facilities • the lack of a defined methodology for calculating greenspace requirements, • The National Planning Policy Framework (2024) and draft NPPF Policy L2, emphasise that planning policies should support economic growth and effective land use. The application of a generic open space requirement constrains site layouts and reduces development capacity, conflicting with wider growth ambitions. Policy BG/EO should be revised to allow for case-by-case assessment of open space provision, promoting a flexible approach aligned with national policy on effective land use, economic growth and plan deliverability. 	<p>203424 (Bidwells on behalf on Babraham Research Campus), 204148 (Bidwells on behalf of Railpen), 204413 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure Ltd), 204435 (Bidwells on behalf of Tritax Big Box Development), 204587 (Carter Jonas on behalf Redrow South Midlands)</p>
<p>Policy is too rigid and does not account for the varied operational and spatial needs of employment and commercial development in Greater Cambridge.</p> <p>Concern that a generic open space requirement could hinder site layouts and reduce development capacity, conflicting with national policy and the Government's growth ambitions outlined in Policies E1–E3.</p>	<p>203424 (Bidwells on behalf on Babraham Research Campus), 204148 (Bidwells on behalf of Railpen), 204413 (Bidwells on behalf of Brookgate Land Ltd and Network Rail Infrastructure</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>BRC, Brookgate Land/Network Rial Infrastructure and Tritax Big Box Development suggest that policy should be revised to allow for case-by-case assessment of open space provision, promoting a flexible approach aligned with national policy on effective land use, economic growth and plan deliverability.</p> <p>Railpen suggest that “hectares per employee” requirement is removed.</p>	<p>Ltd), 204435 (Bidwells on behalf of Tritax Big Box Development)</p>
<p>There is a risk of overlapping and conflicting requirements which may make viability and deliverability challenging (particularly when considered in the round with statutory BNG, the proposed draft tree canopy policy, and the proposed public open space requirements for housing).</p> <p>Suggestion from Redrow South Midlands that the policy should be reviewed for potential overlap with other requirements.</p>	<p>207173 (Stantec on behalf of British Land), 204857 (Carter Jonas on behalf of Redrow South Midlands)</p>
<p>The policy could inadvertently create an informal open space tariff through off-site financial contributions without a clear CIL compliant methodology.</p>	<p>204857 (Carter Jonas on behalf of Redrow South Midlands)</p>
<p>Objection does not support the introduction of a standard for major residential development, as it may not consider local availability of open spaces, play space and outdoor sports facilities.</p> <p>Where there are play spaces with in close proximity to a development it may be a more effective approach for improvement to be made to those spaces rather than requiring provision on site. HBF would suggest the proposed standards in part 2 are not included in the local plan.</p>	<p>205302 (Home Builders Federation)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Objection as the policy does not explicitly recognise the role of public rights of way and equestrian access within or to these spaces. Development proposals should ensure that open space design and access ensures bridleway connectivity through open spaces are fully realised.</p>	<p>203536 (British Horse Society), 203794 (S Rogers)</p>
<p>Policy wording pays very little attention to the fact that delivery must also prioritise biodiversity-rich spaces and equitable access rather than defaulting to large areas of amenity grass. It should require that new and enhanced open spaces are designed to support nature recovery and climate resilience with a focus on trees, hedgerows, species-rich grassland, and water and wetlands and, it should specifically reference and require physical accessibility of open spaces for disabled users.</p>	<p>203693 (Cambridge Green Party)</p>
<p>Long-term maintenance of biodiversity values and nature, and funding must be secured, including replacement of failed planting and ongoing habitat management.</p>	<p>203693 (Cambridge Green Party)</p>
<p>Comments relating to support for integration youth and young people with open space, children's play space and public realm provisions:</p> <ul style="list-style-type: none"> • specific comment about the need to ensure teenagers and young adults are involved *at design stage* particularly in respect of the existing lack of provision for teenage girls • to ensure that open spaces are large enough for *informal* team games. • that provision is made for public realm adjacencies that increase safety (through excellent design), particularly enabling girls and young women: provide ample lighting, heat/shelter, toilets, food, water a.o. • support for accessible urban sports provisions (including active landscaping, skating a.o'#) and public realm provisions to suit outdoors 'non-programmed' behaviours • expand programme for youth centres: to allow for outdoors gathering (not in playgrounds) 	<p>203793 (A Carpen), 204258 (A Giarlis), 204261 (L Cooke), 204375 (NEUBAU Architecture Ltd), 204523 (T Woodcock), 204565 (Max Fordham), 204768 (M Cleminson), 204930 (Mothers CAN Cambridge),</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> • desire for public realm designs to incorporate more engaging elements for children, citing the success of Dinky Doors as an example. • Max Frodham recommends adopting policies similar to The London Plan S4, which includes playable landscapes designing for independence and creating accessible routes to reach children to reach play areas, schools, and youth centres safely and for large-scale public realm developments to include incidental play spaces to enhance playability. • advocating for integrated play and playable landscapes in Cambridge 	205221 (Cambridge Junction/Create Cambridge)
<p>Support for public realm re-design using a multi-disciplinary approach and integrating transport with urban design priorities including landscaping, surfacing, active landscaping and urban sports, seating, lighting a.o, with reference to with reference to S/PRIA/EG and the Elizabeth Way bridge and Underpass(es) cultural hub community project (which is a project providing accessible Community Group-led cultural, recreational and commercial uses).</p>	204258 (A Giarlis), 204261 (L Cooke), 204375 (NEUBAU Architecture Ltd), 204523 (T Woodcock), 204768 (M Cleminson), 205221 (Cambridge Junction/Create Cambridge), 205420 (Z Svendsen)
<p>In principle support for the provision of open space with new developments but that such provision needs to be balanced/consistent with other policy requirements as set out in the draft GCLP, namely Policy BG/BG, BG/GI, Policy BC/TC, Policy: WS/NC Policy BG/EO and Policy H/SS, which restrict opportunities for density uplift and delivery of housing supply with overall reduction in net developable</p>	204838 (Hill)

Summary of issues raised in comments	Comments highlighting this issue
area. It is equally important that such provision if required to be delivered off site does not result in high financial contributions or risk of delay to development.	
Welcome many aspects of policy, but flawed in that (POS) targets are set for Greater Cambridge rather than wards or sectors within the City. Public and private open space needs to be tracked by ward or City sector. Unless open spaces are considered by ward or City sector, POS targets cannot be met in a way that benefits local residents and excessive loss of private and public open space cannot be easily guarded against.	204870 (K Wiemer), 208620 (Madingley Road Area Residents Association), 208621 (K Weimer)
Comment that reference to Mill Road Cemetery not found, this being a significant asset in built-up area and which contributes to meeting the Council's statutory open-space provision (and as a listed site)	205198 (M Widdess)
Comment that every opportunity should be found to use some of any land available for development to provide open spaces for existing communities without nearby access.	205342 (D Stoughton)
Comment in support recognition of green spaces but which urges the local plan adopts to protect by renewal the verges and create biodiverse planting, to make it easier for residents to get support and funding for projects (cites in Silverwood Close)	205428 (B Smith)
Children's playspace of 0.55ha is far below 0.8ha recommendation and there is no mention for 1.6ha per 1000/pop to ensure Cambridge continue to build open space and recreation areas within new developments, by area/region not averaged across greater Cambridge population.	205500 (E Green)
Strong support for environmentally friendly farming, especially if it is regenerative farming and comment to support existing local regenerative/ organic farmers in every way possible.	205531 (M Clarke)

Summary of issues raised in comments	Comments highlighting this issue
<p>Comment that referenced data is not up to date. Comment gives example of the 2011 Open Space and Recreation Strategy Document- Since 2011 an area of land in Newnham ward previously categorised as public has been clarified as private (NAT 19 Meadow Triangle) and private open land has been lost to development (SPO 41, Cocks and Hens Lawn Tennis Club). The club was relocated several miles away despite the requirements of current Local Plan Policy 67</p>	<p>208621 (K Weimer)</p>
<p>Sport England supports the policy but notes that the PPS is currently only at Stage C. Completion of the PPS is required before Sport England can support the Local Plan, and it should be listed as a key supporting evidence document.</p>	<p>210845 (Sports England)</p>
<p>We endorse the proposed standard of 0.4 ha of food-growing/allotment space per 1,000 people within open-space requirements.</p>	<p>208187 (Cambridge Sustainable Food)</p>
<p>Attenuation ponds should not be counted as accessible green space in the green space provision calculations.</p>	<p>203261 (Cllr C Hofman)</p>
<p>Policy BG/EO sets an accessible green space quantity standard; we ask how the plan will ensure this is met in areas without new development.</p>	<p>203273 (Horseheath PC)</p>
<p>LSH supports the inclusion of public open spaces within future developments, as part of creating high quality functional spaces for residents to enjoy.</p>	<p>211238 (Living Space Housing)</p>
<p>Open spaces should include bridleway perimeter routes or cross routes so that horse riders are included.</p>	<p>203974 (S Rogers)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>It is a serious weakness to lack an equivalent to the crucial clear Appendix I 'Table of Standards'. Key numbers and methods are spread across policies, guidance and evidence, providing less direct visibility for the most POS-deficient wards. This draft plan's wording is less focused on the ward-level deficits in Cambridge. This makes it harder even for anyone to highlight clear, plan-embedded, numeric requirements and locally targeted obligations for Public Open Space in underserved wards like Petersfield. Furthermore, the most recent ward-level data rely on the ancient 2011 Open Space and Recreation Strategy document. These serious flaws must be rectified.</p>	<p>203357 (B Greig)</p>
<p>Labelling of the policy is incorrect.</p>	<p>210175 (Stantec on behalf of British Land)</p>
<p>It is noted that policy standards are still being explored by Greater Cambridge, and MGL would welcome the opportunity to discuss how open space would be best achieved at Cambourne North.</p>	<p>208270 (Savills on behalf of Martin Grant Land)</p>
<p>The National Trust agrees with the wording of this policy which states that new development must address its open space requirements through on-site provision and/or financial contributions for off-site provision, including future management. An additional bullet point should be added to ensure that the open space is provided and available to use prior to first occupation of the dwellings.</p>	<p>208457 (The National Trust)</p>
<p>The absence of confirmed standards creates uncertainty for site capacity assumptions, viability testing and the assessment of proposed allocations across the plan as a whole.</p>	<p>210242 (Turley on behalf of Vistry Group), 211761 (Urban & Civic)</p>

Summary of issues raised in comments	Comments highlighting this issue
The draft Policy does not provide information (per population target) for all open space standards. The draft Policy lacks clarity and as written is difficult to interpret.	
<p>EEAST recommends for both physical and mental health and wellbeing:</p> <ul style="list-style-type: none"> • Community gardens, orchards, allotments and wildlife corridors • Seating areas for those with limited mobility • Consideration of sensory planting (sight, touch, smell, sound, taste) to promote wellbeing. 	210325 (East of England Ambulance Service NHS Trust)
Supportive of the policy but it is not enough for a developer to supply new open spaces and have no responsibility and accountability for their longer term maintenance.	210940 (Great Shelford PC)
Support for policy.	211463 (Hayfield Homes Construction Ltd)
It is important that the policy provides greater clarity and flexibility, particularly in acknowledging that the scale, type and location of open space provision should be informed by site-specific circumstances, existing local provision and identified gaps in accessible greenspace. Flexibility should be retained to allow for an appropriate balance between on-site provision and off-site contributions.	210243 (Turley on behalf of Vistry)
It is essential that any such standards are robustly justified, aligned with national policy and guidance and capable of being viably delivered. Given that a number of the standards remain under exploration, Vistry and The Quay Estate reserve the right to comment further on the detailed requirements of Policy BG/EO as the plan progresses.	210244 (Turley on behalf of Vistry)

Summary of issues raised in comments	Comments highlighting this issue
Typing errors highlighted	207175 (Stantec on behalf of British Land)