

Consultation Statement

Appendix 6: Response to Representations - Appendices



Greater Cambridge Local Plan

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



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

Appendices

Appendix A: Glossary

Abbreviations

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

Summary of Main Issues:

British Horse Society sought additional references to rights of way including equestrians. The County Council highlight that the Minerals and Waste Plan description requires an update.

Response to main issues raised in representations:

Representations are noted. The Minerals and Waste Plan position will be updated.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>Amenity, Climate change mitigation, Policies map should all include Rights of Way in the definition. Sustainable modes of transport should specifically include equestrians otherwise they will be excluded. Transport assessment should include equestrians and recognise leisure journeys. Wheeling - should include carriages drivers who are often disabled or have mobility challenges.</p>	<p>201679 (British Horse Society)</p>
<p>Update needed to entry for Cambridgeshire and Peterborough Minerals and Waste Plan</p>	<p>210607 (Cambs County Council)</p>

Appendix D (now Appendix C): Housing requirements for neighbourhood areas within Greater Cambridge

Abbreviations

PC= Parish Council, DC= District Council, TC= Town Council, GCLP= Greater Cambridge Local Plan

Summary of Main Issues:

Comments sought measures to ensure neighbourhood area requirements are delivered, and asked that the neighbourhood area requirements are adjusted to take account of the settlement hierarchy and reflect market and affordable housing needs of individual areas. Comments highlighted that their relationship with existing Neighbourhood Plans should be clarified, and asked that the figures are referred to as minimum numbers. A specific request was made by Girton Neighbourhood Plan Team to amend the housing requirement for Girton, reflecting that a proportion of the population is from Eddington. Comments asked that the Local Plan allows Neighbourhood Plans to release land from the Green Belt.

Response to main issues raised in representations:

National planning policy requires local plans to set out a housing requirement for designated neighbourhood areas, which falls within the overall housing requirement and which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Planning Practice Guidance makes clear that such requirements cannot be binding, as neighbourhood plans are not required to plan for housing. The neighbourhood area housing requirements are therefore not relied upon to meet the overall local housing need identified in the Local Plan. Individual Neighbourhood Plans could also choose to exceed this housing requirement in response to particular local housing issues, such as an affordable housing needs assessment for the village or parish.

The neighbourhood area housing requirements have been calculated based on the overall housing requirement for Greater Cambridge, the population of the neighbourhood area, and the most recent planning strategy. By using the population of the neighbourhood area, the settlement hierarchy has been taken into account – as the population of a parish has been considered within the consideration of the settlement hierarchy.

The neighbourhood area housing requirements set out within the Local Plan will apply to any future Neighbourhood Plans that decide to plan for housing. Specific housing requirements are included for those neighbourhood areas already designated, and the methodology is included to enable the calculation of a housing requirement for any new neighbourhood areas designated.

The neighbourhood area for Girton includes the proportion of Eddington that falls within the parish of Girton, and therefore it is appropriate for the housing requirement for this neighbourhood area to take account of the total population within the parish. A neighbourhood area could be designated for part of a parish, in the same way as a neighbourhood area has been designated for only part of the parish of Great Abington or part of the parish of Histon and Impington, and where this is the case the population of the neighbourhood area has been calculated based on the best fit of census output areas.

Exceptional circumstances have not been identified for release of land from the Green Belt through strategic policies.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
There is no policy mechanism in the Draft GCLP to ensure that the housing requirements for Neighbourhood Areas are	201962 (KG Moss Will Trust & Moss Family), 201979 (Shelford Investments), 202129 (Cambridgeshire County Council –

Summary of issues raised in comments	Comments highlighting this issue
<p>delivered. New policy requirement is needed to deal with situations where a Neighbourhood Plan is not updated, the Neighbourhood Plan does not allocate sites, or a Neighbourhood Plan is not prepared, so that the identified housing requirements will be met within the plan period.</p>	<p>Strategic Assets), 202587 (Ely Diocesan Board of Finance), 204605 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 202374 (The CLC Trust), 203913 (Hill Residential – Fulbourn Site), 203975 (Hill Residential – Sawston Site), 204442 (Hill Residential – Great Abington Site), 211251 (Manor Oak Homes), 211624 (Bloor Homes Eastern)</p>
<p>An adjustment to the housing requirement should be made to reflect the affordable housing needs of villages.</p>	<p>201962 (KG Moss Will Trust & Moss Family), 201979 (Shelford Investments), 202129 (Cambridgeshire County Council – Strategic Assets), 202587 (Ely Diocesan Board of Finance), 204605 (Axis Land Partnerships and Executors of Norman Winfrid Moore), 202374 (The CLC Trust), 203913 (Hill Residential – Fulbourn Site), 203975 (Hill Residential – Sawston Site), 204442 (Hill Residential – Great Abington Site), 211251 (Manor Oak Homes), 211620 (Bloor Homes Eastern), 211623 (Bloor Homes Eastern)</p>
<p>The Draft GCLP needs to allow a Neighbourhood Plan to release land from the Green Belt to meet its identified housing requirement. Paragraph 145 of the NPPF 2024 states that where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to</p>	<p>201962 (KG Moss Will Trust & Moss Family), 201979 (Shelford Investments), 202129 (Cambridgeshire County Council – Strategic Assets), 202587 (Ely Diocesan Board of Finance), 202374 (The CLC Trust), 203913 (Hill Residential – Fulbourn</p>

Summary of issues raised in comments	Comments highlighting this issue
those boundaries may be made through non-strategic policies, including neighbourhood plans.	Site), 203975 (Hill Residential – Sawston Site), 211251 (Manor Oak Homes), 211619 (Bloor Homes Eastern)
The methodology is overly simplistic and unjustified - it does not take account of local market and affordable housing needs and fails to recognise the settlement hierarchy. The approach should consider local needs for market and affordable homes, demographics, affordability and service capacity.	205119 (Endurance Estates), 206864 (Endurance Estates)
<p>Relationship between Appendix D housing requirements and Neighbourhood Plans needs to be clarified, as not clear whether the housing requirements:</p> <ul style="list-style-type: none"> • identified are just for forthcoming Neighbourhood Plans, • are in addition to any needs identified through Neighbourhood Plans, or • take precedence over any identified figures in existing Neighbourhood Plans. 	209749 (Endurance Estates)
Need to set out that the housing requirements are minimum figures and not ceilings for growth.	209750 (Endurance Estates)
Allocations should be made in villages to meet the identified housing requirement for the village.	201962 (KG Moss Will Trust & Moss Family), 201979 (Shelford Investments), 202129 (Cambridgeshire County Council – Strategic Assets), 202587 (Ely Diocesan Board of Finance), 204605 (Axis Land Partnerships and Executors of Norman

Summary of issues raised in comments	Comments highlighting this issue
	Winfrid Moore), 202374 (The CLC Trust), 203913 (Hill Residential – Fulbourn Site), 203975 (Hill Residential – Sawston Site), 211618 (Bloor Homes Eastern)
The indicative figure of 90 dwellings for the non-Eddington portion of Girton should be adjusted to reflect that some of the population in 2021 lived in Eddington. Suggested that approximately 80 dwellings provides a more accurate estimate based on Census 2021 data.	202167 (Girton Neighbourhood Plan Team)
The housing requirements are noted, and the new housing needed will be in addition to the allocations in the GCLP and confirmed through allocations in Neighbourhood Plans.	205151 (Abbey Properties Cambridgeshire Limited)

Appendix E (now Appendix D): Housing Trajectory and five year housing land supply calculation

Abbreviations

PC= Parish Council, DC= District Council, TC= Town Council, GCLP= Greater Cambridge Local Plan

Summary of Main Issues:

Comments address the contents of the housing trajectory, raising issues including:

- assumed delivery rates being too optimistic, and well above historic rates,
- credibility of seven strategic sites being able to deliver at such exceptional rates,
- the relationship with infrastructure delivery,
- the need to allocate additional sites to provide a five year supply at adoption and during plan period, and
- headroom of 6.5% being insufficient.

Response to main issues raised in representations:

The Housing Delivery Study for Greater Cambridge – Addendum (2026) sets out AECOM's recommendations for responding to the representations relating to housing delivery, including build out rates and lead-in times, and it also sets out AECOM's review of the housing trajectory for the Local Plan, including considering the Councils' housing trajectories for the new allocations and the overall deliverability of the development strategy.

The Housing Delivery Study (across its suite of reports from 2020 to 2026) provides a detailed analysis of housing delivery in Greater Cambridge, including data comparing build out rates and lead in times for strategic scale developments across the OxCam

Arc and to Lichfield's Start to Finish report recommendations, and a literature review of published housing delivery information including from Inspectors' Reports and other research reports. From their research, AECOM recommend to the Councils a series of assumptions for lead-in times and build out rates for strategic and non-strategic sites, and depending on the location and / or anticipated housing mix for the site. AECOM also allow for variations from its recommendations where there is site specific evidence to support a different approach.

The Councils' baseline housing trajectory is set out in the [Greater Cambridge Housing Trajectory and Housing Land Supply Report \(April 2026\)](#) and was produced following extensive engagement with landowners and developers, and taking a robust approach to assessing the deliverability and / or developability of every allocation and site of 10 dwellings or more with planning permission (or a resolution to grant planning permission), and all sites for student or older peoples bedrooms. The methodology used by the Councils to prepare the housing trajectory and assess the deliverability and / or developability of each site is set out in the report. Clear and justified evidence has been provided for each site that has been assessed as being deliverable and / or developable, taking account of the definitions in the NPPF 2024, the size and planning status of the site, and information from a number of sources. The Councils have undertaken a similar exercise to gather information from the developers, landowners, housebuilders and agents of the new Local Plan allocations, and this alongside the Councils assumptions relating to the delivery of each site, is set out in Appendix 10 of the Development Strategy Topic Paper (2026).

Historic annual completions are not always reflective of future annual completions, as within the delivery of strategic sites reserved matters applications for residential uses are brought forward continuously and simultaneously over time, and therefore annual residential completion rates on these sites will also increase over time to reflect this. This is recognised in the typical assumptions for build out rates developed by AECOM, which show that annual housing completions build up over the initial years, before reaching a peak, and then gradually decline over the final few years of the development. The housing trajectories for all the

strategic sites assume a gradual build up, followed by a number of years delivering peak housing completions, before gradually slowing down towards the end of the build. The only instances of housing completions over the peak annual housing completions recommended by AECOM are in the earlier years on existing sites where the Councils have information on anticipated completions from the developer, agent, or housebuilder.

In preparing the housing trajectories for each of the existing strategic sites, the Councils take into account the anticipated delivery of specific transport infrastructure required through planning conditions to be in place before occupations reach specific levels. The lead-in times for each of the new strategic sites take account of site specific information including the likely delivery of specific infrastructure or the relocation of existing uses.

The Housing Delivery Study – Addendum (2026) confirms that the recommendations in the Housing Delivery Study (2021) for lead-in times and build out rates are realistic and reliable for use in plan-making in the Greater Cambridge area. It also confirms that the Councils housing trajectory for the Local Plan is realistic and deliverable, and that the Councils will have a five year supply at adoption of the Local Plan based on applying a 5% buffer and using the Liverpool methodology. The Liverpool methodology has been used due to the circumstances that exist in Greater Cambridge, which mean that a sustained increased level of annual completions at or above the annual housing requirement is not anticipated until the second half of the plan period due to the sustainable development strategy set out in this plan and the infrastructure constraints relating to water and transport (for which improvements are not anticipated to be delivered until later in the plan period).

A response to representations relating to the size of headroom (or buffer) in supply beyond the identified need is set out in the responses to Policy S/DS.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
<p>The housing trajectory is based on over optimistic delivery rates for major sites, that are well above historic rates.</p>	<p>202341 (Granta Land Ltd – Land at Valley Farm, Meldreth), 202547 (Granta Land Ltd – Land west of Station Road, Meldreth), 202659 (Granta Land Ltd – Land at Sheene Farm, Meldreth), 202673 (Granta Land Ltd – Land east of Station Road, Meldreth), 206214 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208776 (Croudace Homes), 208783 (Axis Land Partnerships Ltd) 211416 (Cala Homes)</p>
<p>The projected delivery assumptions are unrealistic.</p>	<p>204937 (Pigeon), 205077 (Endurance Estates), 211670, 211671 (Smithson Hill)</p>
<p>Comments on the delivery of North West Cambridge:</p> <ul style="list-style-type: none"> • Outline planning application for future phases is under consideration, unlikely to be approved before late 2026, with reserved matters applications to follow. Implausible that 305 dwellings in 2028/29 and 376 dwellings in 2029/30 can be delivered. • More reasonable assumption is 100 dwellings per year. 	<p>202341 (Granta Land Ltd – Land at Valley Farm, Meldreth), 202547 (Granta Land Ltd – Land west of Station Road, Meldreth), 202659 (Granta Land Ltd – Land at Sheene Farm, Meldreth), 202673 (Granta Land Ltd – Land east of Station Road, Meldreth), 206224 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208783 (Axis Land Partnerships Ltd)</p>
<p>Comments on the delivery of Northstowe:</p> <ul style="list-style-type: none"> • Historic maximum annual delivery rate of 278 dwellings in 2018/19. Only 92 dwellings completed in 2023/24. 	<p>202341 (Granta Land Ltd – Land at Valley Farm, Meldreth), 202547 (Granta Land Ltd – Land west of Station Road, Meldreth), 202659 (Granta Land Ltd – Land at Sheene Farm, Meldreth), 202673 (Granta Land Ltd – Land east of Station</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> Phase 1 is almost complete and phase 2 has 706 dwellings permitted. Implausible that 473 dwellings in 2028/29 and 467 dwellings in 2029/30 can be delivered. More reasonable assumption is 300 dwellings per year. 	Road, Meldreth), 206224 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208783 (Axis Land Partnerships Ltd), 206784 (Endurance Estates)
Comments on the delivery of Waterbeach New Town: <ul style="list-style-type: none"> 263 dwellings completed in 2022/23, with completions declining since then. Unlikely that 376 dwellings in 2028/29 and 368 dwellings in 2029/30 can be delivered. More reasonable assumption is 300 dwellings per year. 	202341 (Granta Land Ltd – Land at Valley Farm, Meldreth), 202547 (Granta Land Ltd – Land west of Station Road, Meldreth), 202659 (Granta Land Ltd – Land at Sheene Farm, Meldreth), 202673 (Granta Land Ltd – Land east of Station Road, Meldreth), 206224 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208783 (Axis Land Partnerships Ltd)
Given historic experience, particularly regarding delivery of major infrastructure, it is not credible to assume seven strategic sites will be able to deliver at historically exceptional rates.	202341 (Granta Land Ltd – Land at Valley Farm, Meldreth), 202547 (Granta Land Ltd – Land west of Station Road, Meldreth), 202659 (Granta Land Ltd – Land at Sheene Farm, Meldreth), 202673 (Granta Land Ltd – Land east of Station Road, Meldreth), 206222 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208783 (Axis Land Partnerships Ltd)
Five year supply on adoption is less than five years, when anticipated completions are reduced.	202341 (Granta Land Ltd – Land at Valley Farm, Meldreth), 202547 (Granta Land Ltd – Land west of Station Road, Meldreth), 202659 (Granta Land Ltd – Land at Sheene Farm, Meldreth), 202673 (Granta Land Ltd – Land east of Station Road, Meldreth), 204937 (Pigeon), 205077 (Endurance

Summary of issues raised in comments	Comments highlighting this issue
	Estates), 206214 (Granta Land Ltd – Land at Valley Farm, Meldreth), 206222 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208776 (Croudace Homes), 208783 (Axis Land Partnerships Ltd)
Five year supply does not exceed 5.5 years within the plan period, and at adoption is estimated to be 5.15 years. Good probability that five year supply will slip below 5 years. This does not align with the growth aspirations for Cambridge or the Governments aspirations to significantly boost housing supply.	208393 (Ceres Property, on behalf of landowner of Freisland Farm, Swavesey)
To secure a five year supply on adoption of the plan, need to make significant additional allocations for small / medium developments that do not have significant infrastructure requirements and therefore can be delivered earlier in the plan period.	202341 (Granta Land Ltd – Land at Valley Farm, Meldreth), 202547 (Granta Land Ltd – Land west of Station Road, Meldreth), 202659 (Granta Land Ltd – Land at Sheene Farm, Meldreth), 202673 (Granta Land Ltd – Land east of Station Road, Meldreth), 204937 (Pigeon), 205077 (Endurance Estates), 206223 (Granta Land Ltd – Land at Valley Farm, Meldreth), 208783 (Axis Land Partnerships Ltd), 208393 (Ceres Property, on behalf of landowner of Freisland Farm, Swavesey), 208394 (Ceres Property, on behalf of landowner of Freisland Farm, Swavesey), 208366 (Endurance Estates)
Windfall rates are unjustified.	211673 (Smithson Hill)

Summary of issues raised in comments	Comments highlighting this issue
Headroom of 6.5% is insufficient.	204937 (Pigeon), 205077 (Endurance Estates), 208394 (Ceres Property, on behalf of landowner of Freisland Farm, Swavesey) 209695 (CEG), 211669 (Smithson Hill)

Appendix G: Marketing, Local Needs Assessments and Viability Appraisals

Abbreviations

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

Summary of Main Issues:

One representor comments on the need to research approaches to viability assessments to inform policy.

Response to main issues raised in representations:

Comment noted. The policy approach to viability assessments is considered robust.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Commission research paper on the loopholes within the existing system of viability assessments to info future policy	203823 (A Carpen)

Appendix H: Skyline and tall buildings guidance

Abbreviations

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

Summary of Main Issues:

Two comments challenge the approach to setting numerical rather than place focused limits. Two comments sought clarity on whether heights quoted included rooftop plant.

Response to main issues raised in representations:

Comments are noted. The policy framework enabling consideration of tall buildings offers a sound approach, aiding the consideration of proposals. Wider policies within the plan consider density and accessibility. The approach to plant is specifically addressed in the policy.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Plan obsessed with height as a metric. Should focus on creating dense walkable and liveable neighbourhoods.	201169 (T Isazawa)
Priority should be given to the local context heights rather than to numerical limits	201301 (N Campbell)

Summary of issues raised in comments	Comments highlighting this issue
Plan should specify 'assuming a flat roof with no rooftop plant'	205215 (K Wiemer), 208622 (Madingley Road Area Residents Association)

Appendix I: Shopfront guidance

Abbreviations

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

Summary of Main Issues:

One representation sought amendments to the guidance to awnings and use of A Boards.

Response to main issues raised in representations:

The blinds and canopies section of the guidance provides appropriate context for considering proposals, noting their typically limited role in providing shade. It is not appropriate to set a specific distance for A boards as it will depend on site specific circumstances.

Table of representations:

Summary of issues raised in comments	Comments highlighting this issue
Guidance on Awnings may need to be reconsidered, as we may need wider use of Awnings to provide more shade in response to climate change.	202556 (P Tribble)
Statement on A-boards about "without impeding pedestrian movement or access" needs to be strengthened.	202556 (P Tribble)